

## **CR-05 - Goals and Outcomes**

### **Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)**

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City of Eau Claire Program Year 2014 (PY14) Consolidated Annual Performance and Evaluation Report (CAPER) is the fourth year of the annual performance reports, which describes the actions and funding priorities used to carry out the PY 2010-2014 Consolidated Plan. This report describes progress made in the PY14 from August 1, 2014 to July 31, 2015, toward the goals set forth in the PY 2010-2014 Consolidated Plan. During PY14, the City of Eau Claire Housing Division expended \$1,088,155 in Community Development Block Grant and HOME Investment Partnership Grant funds on over 35 projects. Highlights of performance accomplishments according to specific need categories include:

#### **Housing**

- Assisted 2 homebuyer with direct homeownership assistance
- 11 new homeowners received rehabilitation loans to rehab their owner-occupied residential units, including the abatement of lead in 9 of those units and the abatement of asbestos in 2 units.
- 8 low/mod homeowners received HOME Weatherization Grants (6 – Eau Claire Housing Division & 2 – Western Dairyland)
- 2 single family home was purchased and will be rehabilitated for the Homeownership Program.

#### **Public Services**

- 68 persons facing domestic violence sought shelter and support services,
- 130 families received case management assistance to help care for their children,
- 1023 persons sought emergency shelter as a result of homelessness,
- 724 received primary health care services from the Free Clinic,
- 828 persons received meals from the Community Table soup kitchen,
- 48 households received rental assistance with the Tenant Based Rental Assistance program,
- 732 Hmong households received tenant/landlord counseling, 54 Women and minorities received employment & business start-up services
- 49 Women and minorities received employment & business start-up services
- 141 received Literary Assistance with the Chippewa Valley Literacy Association

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Assist LMI Owner-Occupied Households	Affordable Housing	CDBG: \$255000 / HOME: \$75000	Homeowner Housing Rehabilitated	Household Housing Unit	15	11	73.33%	22	25	113.64%
Assist LMI Renter Households	Affordable Housing	HOME: \$125000	Direct Financial Assistance to Homebuyers	Households Assisted	5	2	40.00%		0	
Assist LMI Renter Households	Affordable Housing	HOME: \$125000	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	50	48	96.00%	50	46	92.00%
Expand and Preserve Affordable Housing	Affordable Housing	CDBG: \$0 / HOME: \$59300	Rental units rehabilitated	Household Housing Unit	1	0	0.00%	1	0	0.00%
Expand and Preserve Affordable Housing	Affordable Housing	CDBG: \$0 / HOME: \$59300	Homeowner Housing Added	Household Housing Unit	1	0	0.00%		0	

Improve Assistance for LMI Persons	Non-Housing Community Development	CDBG: \$46100	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted		199		1810	2604	143.87%
Improve Assistance for LMI Persons	Non-Housing Community Development	CDBG: \$46100	Other	Other	9760	0	0.00%		0	
Increase Efforts to Address Lead Hazards	Affordable Housing	CDBG: \$25000	Homeowner Housing Rehabilitated	Household Housing Unit	4	2	50.00%	7	9	128.57%
Provide Assistance to Homeless Persons	Homeless	CDBG: \$32600	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted		269		300	269	89.67%
Provide Assistance to Homeless Persons	Homeless	CDBG: \$32600	Homeless Person Overnight Shelter	Persons Assisted	1205	900	74.69%	1000	900	90.00%
Provide Assistance to Homeless Persons	Homeless	CDBG: \$32600	Homelessness Prevention	Persons Assisted		0		205	123	60.00%
Provide Assistance to LMI with Job Creation	Non-Housing Community Development	CDBG: \$5500	Jobs created/retained	Jobs	3	3	100.00%	50	49	98.00%

Provide Assistance to LMI with Crime Prevention	Non-Housing Community Development	CDBG: \$10800	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted		0		400	461	115.25%
Provide Assistance to LMI with Crime Prevention	Non-Housing Community Development	CDBG: \$10800	Other	Other	250	461	184.40%		0	
Provide Code Compliance Inspections	Non-Housing Community Development	CDBG: \$62000	Housing Code Enforcement/Foreclosed Property Care	Household Housing Unit	150	155	103.33%	150	155	103.33%
Public Facilities and Improvements	Public Facilities and Improvements	CDBG: \$70200	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit	Households Assisted	100	100	100.00%	100	100	100.00%

**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**

**Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

During the 2014 grant year, CDBG funds were expensed to high priority activities as identified in the action plan.



## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).

91.520(a)

	CDBG	HOME
White	2,703	50
Black or African American	169	2
Asian	573	3
American Indian or American Native	51	0
Native Hawaiian or Other Pacific Islander	10	0
<b>Total</b>	<b>3,506</b>	<b>55</b>
Hispanic	167	0
Not Hispanic	0	0

Table 2 – Table of assistance to racial and ethnic populations by source of funds

### Narrative

## CR-15 - Resources and Investments 91.520(a)

### Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG		633,917	43,015
HOME		288,098	6,871

Table 3 - Resources Made Available

### Narrative

During PY14, the City of Eau Claire Housing Division expended \$1,088,155 in Community Development Block Grant and HOME Investment Partnership Grant funds on over 60 projects.

The City received \$533,100 in 2013 CDBG funds plus \$200,700 in CDBG program income for a total of \$733,800. The City received \$292,600 in HOME funds for the 2013 grant year.

### Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	100	100	Citywide target area

Table 4 – Identify the geographic distribution and location of investments

### Narrative

The chart attached below (2014 Geographic Information) indicates the projects in low-moderate income census tracts they were completed in during the 2014 grant year. All except for one project was located in an area designated as a low-moderate income area of the city.

## Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

There were no projects associated with the City's use of entitlement funds that require or mandate leveraging public and private funds.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	1,382,715
2. Match contributed during current Federal fiscal year	225,179
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	1,607,894
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	1,607,894

**Table 5 – Fiscal Year Summary - HOME Match Report**

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
Western Dairyland	07/31/2015	245,000	0	0	0	0	0	245,000

Table 6 – Match Contribution for the Federal Fiscal Year

### HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	4,672	4,672	2,940	0

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Dollar Amount	0	0	0	0	0	0
Number	9	0	0	0	0	9
Sub-Contracts						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
	Total	Women Business Enterprises	Male			
Contracts						
Dollar Amount	0	0	0			
Number	0	0	0			
Sub-Contracts						
Number	0	0	0			
Dollar Amount	0	0	0			

**Table 8 – Minority Business and Women Business Enterprises**

<b>Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted</b>						
	<b>Total</b>	<b>Minority Property Owners</b>				<b>White Non-Hispanic</b>
		<b>Alaskan Native or American Indian</b>	<b>Asian or Pacific Islander</b>	<b>Black Non-Hispanic</b>	<b>Hispanic</b>	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

**Table 9 – Minority Owners of Rental Property**

<b>Relocation and Real Property Acquisition</b> – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		0		0		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

**Table 10 – Relocation and Real Property Acquisition**

## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	1,205	0
Number of Non-Homeless households to be provided affordable housing units	80	46
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>1,285</b>	<b>46</b>

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	50	46
Number of households supported through The Production of New Units	1	0
Number of households supported through Rehab of Existing Units	11	13
Number of households supported through Acquisition of Existing Units	1	2
<b>Total</b>	<b>63</b>	<b>61</b>

Table 12 – Number of Households Supported

**Discuss the difference between goals and outcomes and problems encountered in meeting these goals.**

In 2014, the City of Eau Claire Housing Division allocated funding to several different agencies that provide shelter to homeless families and individuals. Due to decreasing program funds, not all homeless were provided with affordable housing units.

**Discuss how these outcomes will impact future annual action plans.**

The City of Eau Claire Housing Division will take into consideration the decrease in funding and adjust the goals accordingly on future action plans.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Persons Served	CDBG Actual	HOME Actual
Extremely Low-income	3	35
Low-income	3	10
Moderate-income	5	1
<b>Total</b>	<b>11</b>	<b>46</b>

**Table 13 – Number of Persons Served**

### **Narrative Information**

During the 2014 grant year, the Housing Authority of the City of Eau Claire 46 households with the Tenant Based Rental Assistance (TBRA) program.



## **CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The Housing Authority of the City of Eau Claire continues to hold and attend the Continuum of Care planning sessions with several housing and social service agencies in the area to address homelessness in the Eau Claire area. The group meets monthly to share ideas, identify needs and set agendas to address housing and homeless in Eau Claire.

During the 2014 grant year, the Housing Authority received Supportive Housing Program (SHP) funding to provide first month rent and security deposit, housing counseling, bus/taxi tokens and household cleaning kits. The continuum of Care group continues to work on a City/County wide 10-year plan to end homelessness. Housing Director, Keith Johnathan is on the planning committee for this project.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

**The Housing Authority of the City of Eau Claire** operates three units of transitional housing to shelter homeless families with children. During the 2014 reporting period, five (5) families were housed under these units. The family is able to live in the units for a period of anywhere between nine months and two years. After successfully completing the nine-month program, they have the option to move to public housing or receive a voucher if one is available. Residents are able to take advantage of the case management which is available through the Housing Authority.

**Bolton Refuge House** provided emergency shelter to survivors of domestic violence. In 2014, Bolton Refuge House operated a total of 9 transitional units where 25 women stayed in the transitional units. There still is frequently a waiting list for the Transitional Housing Project as families are waiting to leave the emergency shelter and/or for city or county assistance and affordable housing to become available.

Bolton Refuge House also received \$8,500 for help homeless, abused women and children to provide transitional and emergency shelter and case management.

**Eau Claire Interfaith Hospitality Network** provided emergency shelter and case management services to homeless families with children and homeless pregnant women. In the calendar year 2014, Interfaith provided emergency shelter services to 203 individuals including single pregnant women struggling with

homelessness. Six months after leaving the shelter approximately 60% of the families maintained permanent or transitional housing and 60% of the families were employed or had steady income through SSI. ECIHN has developed and maintained a comprehensive program to assist families with transition into the community.

**Western Dairyland** operates four transitional housing units that provide 31 to 60 days of shelter to families with children and pregnant females. In 2014, Western Dairyland's Homeless Haven program provided shelter to 123 individuals. Case management is provided to help transition the families into permanent housing. Families often receive a voucher or are placed public housing within the City of Eau Claire or Eau Claire County programs.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

The City of Eau Claire Housing Division allocated funding to agencies that operate shelters for homeless individuals and families. The goals of these agencies is to work with the clients to establish sustainability, permanent housing and on-going case management to maintain housing.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The Housing Authority of the City of Eau Claire offers units to tenants that reach the end of their tenancy in their transitional housing units. They also offer a homeless preference to those on the Housing Authority waiting list.

## **CR-30 - Public Housing 91.220(h); 91.320(j)**

### **Actions taken to address the needs of public housing**

*The Housing Authority of the City of Eau Claire* currently operates 110 units of traditional Public Housing. These units consist of single-family homes and duplexes scattered throughout the community. The Authority strives to enhance the buildings and services to improve the physical and social environment at the public housing sites.

### **Actions taken to encourage public housing residents to become more involved in management and participate in homeownership**

The City of Eau Claire Housing Division encourages Public Housing and Tenant Based Rental Assistance (TBRA) tenants to participate in the Homeownership program. Several tenants have transitioned from Public Housing to Homeownership over the years.

Below are some other resident initiatives implemented or sustained during the past program year were:

- Brochures and advertisements were distributed regarding the public housing and voucher program and qualifications to promote the programs.
- A newsletter was compiled and distributed to all Housing tenants regarding housing and other family and budgetary information.
- The Authority continues to have a housing resident appointed to the Housing Authority's board of commissioners.
- Provided self-help brochures to Housing tenants
- Purchased the books "*Haley's Green Hints*" and "*How to say NO and keep your friends*" for Public Housing tenants to fulfill the \$25/occupied units for tenant participation funding.

### **Actions taken to provide assistance to troubled PHAs**

The Housing Authority of the City of Eau Claire is not designated as "troubled" by HUD and has been designated as a "High Performer" for approximately the last 20 years.

## **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

**Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)**

The City of Eau Claire Housing Division has been successful in of updating the City's Fair Housing Code. The final version was taken the City Council and approved in August 2014.

## **Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

The City of Eau Claire Housing Division/Housing Authority is an active participant in the monthly Continuum of Care (COC) meetings. The COC meetings include organizations such as Western Dairyland, Eau Claire Interfaith Hospitality Network, Inc., Bolton Refuge House, Community Table, Salvation Army, United Way, Eau Claire School District, Catholic Charities, Habitat for Humanity, Women's Way, the Aging and Disability Resource Center, Hope Gospel Mission, Positive Avenues, AIDS Resource Center of Wisconsin and the Housing Authority of the City of Eau Claire.

Western Dairyland conducted a Point in Time survey on July 30, 2015 ranking community needs. The final results of the survey were not available before the CAPER deadline. Once that information is received, strategies will be developed to address those needs that ranked as a high priority.

## **Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

The City of Eau Claire Housing Division/Housing Authority is an active participant in the monthly Continuum of Care (COC) meetings. The COC meetings include organizations such as Western Dairyland, Eau Claire Interfaith Hospitality Network, Inc., Bolton Refuge House, Community Table, Salvation Army, United Way, Eau Claire School District, Catholic Charities, Habitat for Humanity, Women's Way, the Aging and Disability Resource Center, Hope Gospel Mission, Positive Avenues, AIDS Resource Center of Wisconsin and the Housing Authority of the City of Eau Claire.

Western Dairyland conducted a Point in Time survey on July 30, 2015 ranking community needs. The final results of the survey were not available before the CAPER deadline. Once that information

## **Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

Employment training and related services were provided by Job Services of Wisconsin, Western Wisconsin Private Industry Council, Eau Claire Hmong Mutual Assistance Association and other entities. Services ranged from specialized efforts to address specific needs to general education. Counseling and case management services were also included.

- **Housing Authority of the City of Eau Claire** provides a mechanism for breaking the poverty cycle through its affordable housing homeownership program for low-income persons.
- **Bolton Refuge House** – *Vocational Advocacy Program*. This project provides an employment advocacy component for victims of domestic abuse. CDBG funds a portion of the Volunteer Coordinator to recruit and train in the areas of transportation and job search. Information on current job openings, how to create cover letters and resumes and on-line access help is provided.
- **Eau Claire Interfaith Hospitality Network** provides emergency shelter to the homeless families. As a part of the program, the clients are provided with case management to help with finding a job and permanent housing.
- **Western Dairyland** – *Business Startup Program* received Community Development Block Grant (CDBG) Funding for a business start up program benefitting women/minorities that are low income in the city limits of Eau Claire. Western Dairyland provided the training and skills to be successful in the workforce for starting up their own business to be an entrepreneur.

### **Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

The City's five year Consolidated Plan identified no major weaknesses in its institutional structure, although an area that could be improved was identified as better coordination and cooperation with both the public and private sectors. The City took three major steps in this area:

- **Redevelopment Authority**. In 1996, the City created the Redevelopment Authority that was organized under Wisconsin Statutes to undertake projects in redevelopment areas in the City. The Redevelopment Authority's seven member commission draws heavily on banking, real estate and business leaders who serve as commissioners to the Authority to plan and implement the redevelopment of properties and promote economic development.

- **Vision Committee.** The City of Eau Claire completed an 18-month process to update its citywide plan to guide community growth. The goals, policies, recommendations and maps contained in the plan will be used by the Plan Commission, City Council, and the private sector to make decisions about land use, economic development, provision of public services, streets, revitalization of neighborhoods, parks, landscaping, and other matters where local government may play a role in meeting the changing needs of the community.

A key part in the update process was the work of a Citizens Advocacy Vision Committee to identify major community issues and establish directions for specific plan elements. The committee was composed of 35 citizens representing a broad spectrum of viewpoints. This broad participation by private citizens strengthens the institutional structure of the City by identifying core community values, strategic issues and potential strategic actions. Housing Director, Keith Johnathan, is a member of the committee.

**City of Eau Claire Housing Division.** The City of Eau Claire Housing Division through the Consolidated Plan planning process and operation of the Community Development Block Grant Program and its other housing programs has significantly increased its community contacts including contacts with over seventy religious organizations, governmental agencies, public services agencies, and private service providers in the Consolidated Plan development alone. It has also met with the Hmong Mutual Assistance Association, served on the board of the local Center for Independent Living, served on the board of a local lending institution's Community Reinvestment Act advisory committee, and met with the City/County Health Department. All of the above actions strengthen the City's ability to carry out its Consolidated Plan priorities.

The City of Eau Claire updates the Comprehensive Plan every 10 years and addressing affordable housing is part of that process. The Housing Authority of the City of Eau Claire is also a part of the updating process.

### **Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

The City of Eau Claire used over \$200,000 of CDBG funding for rehabilitation and lead remediation for owner occupied and rental properties of low-income persons in the City of Eau Claire. Eau Claire has a well-maintained supply of large, older single-family houses that are amenable to rehabilitation. The rehabilitation and lead remediation activities are a high priority need for the City of Eau Claire. Due to

new single-family development growing in the community it is creating opportunities for resale of older houses to moderate-income households. There is a good system of city and county government along with private social service and non-profit housing providers. These organizations can address many of the community's housing problems, which are not as unmanageable as those in some large community. Rehabilitation and lead remediation on future homeowners in those units as well.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)**

The 2014 Action Plan stated that the City of Eau Claire may address, but not limited to, the following identified in the product:

1. Lack of Housing Units Accessible to Persons with Disabilities
  - Eau Claire has a large proportion of older housing which lacks accessibilityThe City of Eau Claire will allocate 2014 CDBG funding to the City's rehabilitation loan program to provide no interest loans to homeowners in need of handicap accessibility.The Housing Authority has recently added units with handicapped accessible features to its Public Housing inventory and will continue to make modifications to existing units as necessary.The City of Eau Claire Housing Division also renovated one of their Homeownership properties, purchased with Neighborhood Stabilization Program (NSP) funds, into a handicapped accessible single family home.
2. Shortage of Affordable Housing Supply Relative to Resident IncomeThe Eau Claire Housing Authority indicates that longest public housing waiting list is for two-bedroom units and units with four or more bedrooms. The City of Eau Claire allocated HOME CHDO funds to the Eau Claire Hmong Mutual Assistance Association who purchased and rehabilitated two Affordable Housing duplexes with at least two bedrooms on each side during the 2012 and 2013 grant years. The City of Eau Claire Housing Division also allocated 2013 and 2014 funding to Western Dairyland for the future development of Affordable Housing units. side.
3. City of Eau Claire's Fair Housing OrdinanceThe ordinance has been revised and was approved by the City of Eau Claire City Council in August 2014. The new ordinance adopts the states code as our policy, as amended, so any future changes to the states code will automatically be adopted as ours.

## **CR-40 - Monitoring 91.220 and 91.230**

**Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

Each agency receiving funds through the CDBG and HOME Programs signed an agreement, which specifically describes the parameters and use of the funds they are receiving. Housing Division staff monitors each project for compliance with federal regulations, state and local codes, ordinances and any other applicable standards that may apply. Each monitoring visit is documented noting the date, location, attendees and highlights of the visit. Each project has a different use of CDBG and HOME funds and therefore has different reporting requirements. All subrecipients were required to submit reports with specific data and documentation as set forth in the agreement. During the 2014 grant year, the Housing Division performed one on-site monitoring visit with each subrecipient for the years covered in the agreement. The following items were reviewed to ensure each subrecipient was:

- Carrying out its funded activities as described in the signed agreement
- Carrying out its activities in a timely manner
- Charging costs to projects which are eligible and reasonable
- Conducting its activities with adequate control over financial performance
- Maintaining the required records to demonstrate compliance with applicable regulations and record keeping requirements. The City of Eau Claire Housing Division disburses CDBG funds on a reimbursement basis only, providing that appropriate and adequate documentation is provided to support the reimbursement request.

### Inspections

All 2014 projects that are completed through the City of Eau Claire Housing Division's Rehabilitation Loan Program and the Down Payment Closing Cost Assistance Program must meet HUD's HQS and local codes. These items are completed as part of the rehabilitation work and final inspections are done upon completion of work.

## **Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to**



## **comment on performance reports.**

Public Notices announcing the Consolidated Annual Performance Evaluation Report (CAPER) public hearings and comment periods were published both in the local newspaper, the *Eau Claire Leader Telegram*, and on the City of Eau Claire Community Development webpage. A notice was also sent to the local news media (WQOW & WEAU TV Stations and local radio stations), Government/Public Access Channel, the University of Wisconsin Eau Claire (UWEC), City of Eau Claire Library and the City of Eau Claire City Council members. In addition, the City sends direct email notices to the following organizations:

- Bolton Refuge House
- Chippewa Valley Free Clinic
- Children's Service Society
- Eau Claire Police Department
- Hmong Mutual Assistance Association
- The Community Table
- Feed My People
- Western Dairyland, Inc.
- City of Eau Claire Public Works
- City of Eau Claire Public Health Department

## **Citizens Participation**

A Public Notice was published in the City of Eau Claire's Leader Telegram. A DRAFT copy of the CAPER was also posted in the City of Eau Claire's website and hard copies were available upon request. The public comment period ran from September 27, 2015 to October 27, 2015. A comment period of not less than 15 days was provided to receive comments prior to the submittal to the Department of Housing and Urban Development (HUD). PUBLIC NOTICEThe City of Eau Claire has prepared the 2014 Consolidated Annual Performance and Evaluation Report (CAPER) for the Community Development Block Grant program and the HOME Investment Partnership program for the period from August 1, 2014 to July 31, 2015. In order to qualify for federal funds, the City of Eau Claire must file these reports with the U.S. Department of Housing and Urban Development. A draft copy of the report is available at the City of Eau Claire Housing Division, 203 South Farwell Street, Eau Claire or at the City of Eau Claire's website [www.ci.eau-claire.wi.us/housing-division/community-development-block-grant](http://www.ci.eau-claire.wi.us/housing-division/community-development-block-grant). Citizens are invited to submit comments to the City of Eau Claire Housing Division, City Hall, P.O. Box 1186, Eau Claire, WI 54702-1186, or call Jennifer Frueh at (715) 839-6108 prior to October 27, 2015, or attend Staff Public Hearings on Wednesday, October 7, 2014 at 1:30 p.m., Thursday, October 15, 2014 at 10:00 a.m. or 3:00 p.m. in the Council Chamber of City Hall, 203 South Farwell Street, Eau Claire, Wisconsin. The hearing impaired may contact this office by voice TDD at (715) 839-4943. If there are other specialized needs due to handicap, i.e. sign language interpreter, wheelchair accessibility, reader,

please contact this office.Housing DivisionCity of Eau ClaireProvide a summary of citizen comments.Despite efforts to publicize the public hearings/comment period, no citizen comments were received.

**CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

The City of Eau Claire did not make any changes in the program objectives during the 2014 grant year and would not change any programs at this time. CDBG funding was allocated to the same public services as funded in previous years and they still prove to be valuable non-profits for the City.

<b>Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?</b>	No
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**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

## **CR-50 - HOME 91.520(d)**

**Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations**

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

During the 2014 grant period, inspections were completed on the Housing Authority of the City of Eau Claire's three transitional units as well as Bolton Refuge House, Western Dairyland and Hmong Association's transitional units. The units were inspected for compliance of U.S. Department of Housing and Urban Development Housing Quality Standards (HQS). All units were in compliance

**Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)**

Marketing of the HOME Program included publication of program availability using the equal opportunity in housing logo has been conducted in a manner, which has promoted the programs to minorities and women. The Rehabilitation/Weatherization Program has committed funds to 55% to female head of household.

HOME Program agreements with the CHDO organizations include language regarding the need to affirmatively market HOME improved units. Construction/Rehabilitation of units took place during the reporting period by the CHDOs, specifically Eau Claire Interfaith Hospitality Network and Bolton Refuge House Marketing of the units after completion will be conducted in an affirmative manner.

Affirmative marketing methods have been successful in the early stages of the HOME Program implementation. It is expected that such results will continue.

**Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics**

In 2014, the City of Eau Claire Housing Division received \$4,672 in program income for the HOME program as a result of early payments from the weatherization program and payback from the Tenant

**Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES**

**ONLY: Including the coordination of LIHTC with the development of affordable housing).**  
**91.320(j)**

The City's housing needs assessment identified two primary housing problems in Eau Claire: (a) the need for rehabilitation of its older housing; and (b) the affordability of housing for its low-income residents. The City's five-year strategy and one-year plan established essentially the same priorities.

In 2014, the City continued to support the Housing Authority of the City of Eau Claire, which has primary responsibility for the strategy and continued to implement most of the programs. The Housing Authority of the City of Eau Claire continued to operate the City's Housing Rehabilitation Loan Program, updated its existing housing programs.

The City of Eau Claire purchased one single-family home in 2014 to use as a homeownership property using federal CDBG funds. The Housing Authority/Housing Division also purchased three (3) units using Neighborhood Stabilization Program (NSP) funding for a second homeowner program using the guidelines. LMI families will be given the option to purchase the home through direct sale or rent the home for a three-year period where one-fourth of the rent they pay goes towards reducing the purchase price. After the three years is up the LMI family will obtain bank financing to purchase the home. The potential home buyers can also qualify for up to two \$15,000 subsidies, which will reduce the price of the home making it more affordable. Program Participants may purchase a home out right, providing they have sufficient funds for down payment and good credit.

## CR-60 - ESG 91.520(g) (ESG Recipients only)

### ESG Supplement to the CAPER in *e-snaps*

#### For Paperwork Reduction Act

#### 1. Recipient Information—All Recipients Complete

##### Basic Grant Information

Recipient Name	EAU CLAIRE
Organizational DUNS Number	020495156
EIN/TIN Number	396005436
Identify the Field Office	MILWAUKEE
Identify CoC(s) in which the recipient or subrecipient(s) will provide ESG assistance	

##### ESG Contact Name

Prefix  
First Name  
Middle Name  
Last Name  
Suffix  
Title

##### ESG Contact Address

Street Address 1  
Street Address 2  
City  
State  
ZIP Code  
Phone Number  
Extension  
Fax Number  
Email Address

##### ESG Secondary Contact

Prefix  
First Name  
Last Name  
Suffix  
Title  
Phone Number  
Extension  
Email Address

#### 2. Reporting Period—All Recipients Complete

Program Year Start Date	08/01/2014
-------------------------	------------

CAPER

**Program Year End Date**

07/31/2015

**3a. Subrecipient Form – Complete one form for each subrecipient**

**Subrecipient or Contractor Name**

**City**

**State**

**Zip Code**

**DUNS Number**

**Is subrecipient a victim services provider**

**Subrecipient Organization Type**

**ESG Subgrant or Contract Award Amount**

## CR-65 - Persons Assisted

### 4. Persons Served

#### 4a. Complete for Homelessness Prevention Activities

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

Table 14 – Household Information for Homeless Prevention Activities

#### 4b. Complete for Rapid Re-Housing Activities

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

Table 15 – Household Information for Rapid Re-Housing Activities

#### 4c. Complete for Shelter

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

Table 16 – Shelter Information



#### 4d. Street Outreach

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

Table 17 – Household Information for Street Outreach

#### 4e. Totals for all Persons Served with ESG

Number of Persons in Households	Total
Adults	
Children	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

Table 18 – Household Information for Persons Served with ESG

#### 5. Gender—Complete for All Activities

	Total
Male	
Female	
Transgender	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

Table 19 – Gender Information

## 6. Age—Complete for All Activities

	<b>Total</b>
Under 18	
18-24	
25 and over	
Don't Know/Refused/Other	
Missing Information	
<b>Total</b>	

**Table 20 – Age Information**

## 7. Special Populations Served—Complete for All Activities

<b>Number of Persons in Households</b>				
<b>Subpopulation</b>	<b>Total</b>	<b>Total Persons Served – Prevention</b>	<b>Total Persons Served – RRH</b>	<b>Total Persons Served in Emergency Shelters</b>
Veterans				
Victims of Domestic Violence				
Elderly				
HIV/AIDS				
Chronically Homeless				
<b>Persons with Disabilities:</b>				
Severely Mentally Ill				
Chronic Substance Abuse				
Other Disability				
Total (unduplicated if possible)				

**Table 21 – Special Population Served**

## CR-70 – ESG 91.520(g) - Assistance Provided and Outcomes

### 10. Shelter Utilization

Number of New Units – Rehabbed	
Number of New Units – Conversion	
Total Number of bed - nighths available	
Total Number of bed - nights provided	
Capacity Utilization	

Table 22 – Shelter Capacity

### 11. Project Outcomes Data measured under the performance standards developed in consultation with the CoC(s)

## CR-75 – Expenditures

### 11. Expenditures

#### 11a. ESG Expenditures for Homelessness Prevention

	Dollar Amount of Expenditures in Program Year		
	2012	2013	2014
Expenditures for Rental Assistance			
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			
Expenditures for Housing Relocation & Stabilization Services - Services			
Expenditures for Homeless Prevention under Emergency Shelter Grants Program			
<b>Subtotal Homelessness Prevention</b>			

Table 23 – ESG Expenditures for Homelessness Prevention

#### 11b. ESG Expenditures for Rapid Re-Housing

	Dollar Amount of Expenditures in Program Year		
	2012	2013	2014
Expenditures for Rental Assistance			
Expenditures for Housing Relocation and Stabilization Services - Financial Assistance			
Expenditures for Housing Relocation & Stabilization Services - Services			
Expenditures for Homeless Assistance under Emergency Shelter Grants Program			
<b>Subtotal Rapid Re-Housing</b>			

Table 24 – ESG Expenditures for Rapid Re-Housing

#### 11c. ESG Expenditures for Emergency Shelter

	Dollar Amount of Expenditures in Program Year		
	2012	2013	2014
Essential Services			
Operations			
Renovation			
Major Rehab			
Conversion			
<b>Subtotal</b>			

Table 25 – ESG Expenditures for Emergency Shelter

**11d. Other Grant Expenditures**

	Dollar Amount of Expenditures in Program Year		
	2012	2013	2014
Street Outreach			
HMIS			
Administration			

**Table 26 - Other Grant Expenditures****11e. Total ESG Grant Funds**

Total ESG Funds Expended	2012	2013	2014

**Table 27 - Total ESG Funds Expended****11f. Match Source**

	2012	2013	2014
Other Non-ESG HUD Funds			
Other Federal Funds			
State Government			
Local Government			
Private Funds			
Other			
Fees			
Program Income			
<b>Total Match Amount</b>			

**Table 28 - Other Funds Expended on Eligible ESG Activities****11g. Total**

Total Amount of Funds Expended on ESG Activities	2012	2013	2014

**Table 29 - Total Amount of Funds Expended on ESG Activities**

## **Attachment**

### **Citizen's Participation**

ATTACHMENT B  
CITY OF EAU CLAIRE  
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM  
CITIZEN PARTICIPATION PLAN

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**I. INTRODUCTION**

The City of Eau Claire Housing Division is in charge of implementing citizen participation requirements as outlined in 24 CFR 570.431 (b) and (c). The City of Eau Claire is committed to follow detailed, written policies and procedures for public involvement in the development of the Consolidated Plan and the use of Community Development Block Grant (CDBG) and HOME Investment Partnership funds.

As a requirement of the U.S. Department of Housing & Urban Development's CDBG/HOME Program, this Citizen Participation Plan was developed to provide citizens with information and knowledge of opportunities to become involved with and comment upon the City of Eau Claire's CDBG/HOME program.

**II. PUBLIC HEARINGS**

Public hearings will be held each year to provide opportunities for public participation at various states of the CDBG/HOME program year.

- (1) The ***Annual Action Plan*** Hearing, held in May, corresponds with draft publication of the CDBG/HOME Action Plan, which outlines the proposed activities for the subsequent program year, which begins August 1. Citizens are asked to view the draft plan on-line or at City Hall prior to providing comments at the hearing.
- (2) The ***Consolidated Annual Performance & Evaluation Report (CAPER)*** Hearing, held in October, corresponds with the draft publication of the CDBG/HOME CAPER, which summarizes the activities undertaken during the previous program year. Citizens are asked to view the CAPER on-line or at City Hall prior to providing comments at the Public Hearing.

**III. PUBLIC COMMENT PERIODS**

Two public comment periods, which last 30 days, are held each year to seek public input, including:

- (1) The ***Annual Action Plan comment Period (June)***. This period marks completion of the Annual Action Plan DRAFT. Citizens are encouraged to review the Annual Action Plan and provide comments, which will be included in the final submission.
- (2) The ***Consolidated Annual Performance & Evaluation Report (CAPER) Comment Period (October)***. This period marks completion of the Consolidated Annual Performance and Evaluation Report (CAPER) DRAFT. Citizens are encouraged to review the CAPER and provide comments, which will be included in the final submission.

**CITY OF EAU CLAIRE  
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM  
CITIZEN PARTICIPATION PLAN**

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**IV. CONSOLIDATED PLAN PUBLIC HEARING/COMMENT PERIOD**

Both a formal public hearing and 30-45 day public comment period will occur as part of the development of each Five Year Consolidated Plan for CDBG/HOME funding.

**V. AS-NEEDED PUBLIC HEARINGS/COMMENT PERIODS**

Special public hearings/comment periods will be administered when substantial amendments to CDBG/HOME-related activities are proposed/requested. Substantial amendments may include, but are not limited to, those involving:

- 1) A dollar amount greater than 25 percent of the original subrecipient award
- 2) Any new activity or change in use of funding from one activity to another
- 3) Occurrence of a natural disaster where "urgent need" funding might apply
- 4) Announcement of new/additional grant funding sources available
- 5) Other unforeseen circumstances relating to CDBG activity

**VI. PUBLICIZING OPPORTUNITIES FOR CITIZEN PARTICIPATION**

Notices announcing public hearings and comment periods are published on the City of Eau Claire CDBG/HOME web site, in the local newspaper – *The Leader Telegram*, faxed to local media and posted at City Hall. Printed copies of the Annual Action Plan and CAPER will be available to the public at the City of Eau Claire Housing Division (203 S Farwell Street, Eau Claire, Wisconsin 54701) and on the City of Eau Claire web page at [www.ci.eau-claire.wi.us/housing-division/community-development-block-grant](http://www.ci.eau-claire.wi.us/housing-division/community-development-block-grant).

**VII. ACCESSIBILITY**

All City of Eau Claire residents, namely persons of low-moderate income, persons with disabilities, persons with limited English-speaking ability and persons of racial minority, are encouraged to contribute input regarding CDBG/HOME funded activities. No person shall be excluded from participation in the City of Eau Claire CDBG/HOME programs on the grounds of race, color, national origin, gender, sexual orientation, age, religious creed or disability. To encourage equal access in participation for persons with disabilities, all CDBG/HOME –related hearings and meetings are held at the City of Eau Claire which is completely handicapped accessible. With advanced notice, the City of Eau Claire will also provide interpreters for speaking and hearing impaired persons.

**VIII. OBJECTIONS TO CDBG/HOME DOCUMENTS**

Citizens may provide comments regarding City of Eau Claire's Annual Action Plan, CAPER, Five-Year Consolidated Plan, proposed Substantial Amendment, or any other CDBG/HOME-related matter at any



**CITY OF EAU CLAIRE  
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM  
CITIZEN PARTICIPATION PLAN**

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time. Comments must include identification of unmet requirements and relevant supporting data and will be considered on the following grounds:

- 1) Stated needs and objectives are inconsistent with available and reliable data
- 2) Stated projects are inappropriate for meeting needs and approved objectives
- 3) Consolidated plan elements do not comply with federal regulations for the CDBG/HOME Program

Comments must be submitted in written form to: **City of Eau Claire Housing Division, 203 S Farwell Street, Eau Claire, WI 54701**. (Office hours are 8:00 a.m. to 5:00 p.m. Monday through Friday) Upon receipt, the Housing Division will present the written comments to the Administrator of the CDBG/HOME Program. All written comments shall receive a written response within 15 days after the Administrator has reviewed the matter.

**IX. TECHNICAL ASSISTANCE**

Three Technical Assistance Workshops will be provided to organizations that serve low-and moderate-income persons in developing their CDBG/HOME subrecipient applications. In addition, the Housing Division shall provide interested parties with access to CDBG/HOME records upon request. All citizens are and/or local agency representatives are encouraged to contact City CDBG/HOME staff with questions about both program guidelines inquiries and general community development needs in the City of Eau Claire.

**X. ANTI-DISPLACEMENT**

Due to the potential liability for long-term assistance and burdens placed on affected tenants, the City of Eau Claire will generally avoid funding CDBG/HOME Projects that involve permanent residential or business displacement. In cases where displacement is absolutely necessary, relocation benefits will be paid in accordance with the Uniform Relocation Act, other applicable federal regulations, and Chapter 32 of the Wisconsin State Statutes.

## Equal Opportunity / Affirmative Action

# Equal Opportunity and Affirmative Action

## Policy Statement

*July 28, 2010*

CITY OF EAU CLAIRE  
L.E. PHILLIPS MEMORIAL PUBLIC LIBRARY  
EAU CLAIRE CITY/COUNTY HEALTH DEPARTMENT  
HOUSING AUTHORITY OF THE CITY OF EAU CLAIRE

Adopted: 1973  
Affirmative Action Committee Structure Change: 1983  
Policy Revised: 1989  
Policy Revised: 1999  
Policy Revised: 2010

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## **EQUAL OPPORTUNITY/AFFIRMATIVE ACTION POLICY STATEMENT**

### **OVERVIEW**

We, the agencies listed below, are committed to providing equal employment opportunities, affirmative action programs and an equitable service delivery system. We strictly prohibit any form of unlawful discrimination in all personnel, employment and service delivery matters. We intend this document to be easily understood and applied. The terms that we use shall be given their ordinary meanings. However, if a legal definition exists for any term, the then most recent legal definition shall substitute for our term. We will comply with all applicable equal opportunity/affirmative action laws. We believe that this is good government and good economics. In the event that a deficiency is found in our organizations, we will establish goals to correct the deficiency. Our policies, procedures and management practices reflect this commitment.

### **Statement of Principles**

We are committed to and will affirmatively implement the following principles:

1. We will provide equal opportunity in all personnel actions, including, but not limited to, recruiting, hiring, apprenticeships, training, transfers, promotions, disciplinary actions, fringe benefits, compensation, terms of employment, working conditions, and terminations without unlawfully considering one's age, race, creed, color, religion, physical or mental impairment, marital status, military service, gender, pregnancy, ancestry, use or non-use of lawful products off of our premises during non-working hours, national origin, sexual orientation, arrest record or conviction record.
2. If appropriate, specific affirmative steps will be taken to address unlawful discrimination. We will conduct an analysis of our workforce and use our analysis as a foundation for developing affirmative action efforts and recruiting goals.
3. Our affirmative action efforts will include reviewing and analyzing personnel policies, procedures and practices to determine if they are necessary, job-related and lawful.
4. We are committed to providing an equitable service delivery system. Services shall be provided without unlawfully discriminating against clients/recipients. We require our agencies, vendors, contractors, sub-contractors, and companies to share our commitment to affirmative action and equal opportunity. Employees, agents, vendors, contractors, companies, and client/service recipients shall notify us of any actual or suspected discrimination or unlawful harassment.

5. We are committed to developing and maintaining an environment free of sexual harassment.
6. We will maintain an Equal Opportunity/Affirmative Action (EO/AA) Citizen's Advisory Committee.
7. We will promptly investigate allegations of unlawful discrimination and unlawful harassment. We shall retain records of our investigations. When practicable, we will seek to maintain the confidentiality of the investigation.

#### **Investigating Complaints**

##### **Filing Complaints**

All individuals with information concerning a possible violation of this Policy Statement, including Complainants, shall file a written complaint with the AA/EO Officer, Director of Human Resources or Agency Director within 30 days of the alleged violation. At their discretion, the AA/EO Officer, Director of Human Resources or Agency Director may extend the 30 day period if the Complainant so requests.

AA/EO complaints shall provide specific details of the alleged violation and offer a recommended solution. The AA/EO Officer, Director of Human Resources or the Agency Director (or designee) shall promptly initiate an investigation of all AA/EO complaints. Investigations will be commenced within 10 business days unless extenuating circumstances exist. Investigators shall consider privacy concerns when conducting investigations. Investigators will ordinarily question individuals having knowledge of either the specific allegation or similar matters. Investigators should promptly conduct, complete the investigation and document their findings and recommendations.

After completing the investigation, the Officer/Director shall promptly notify the Complainant in writing of the investigator's findings and recommendations. The findings and recommendations will ordinarily be provided within 10 business days unless extenuating circumstances exist.

##### **Retaliation Prohibited**

We will not retaliate against any individual for opposing practices that violate this Policy Statement or for filing a complaint, testifying or participating in any way in an investigation, proceeding or litigation. If an employee or client/service recipient believes that he or she is being retaliated against, that employee/client/service recipient shall follow the complaint and appeal process detailed above.

### Review and Record-keeping

Each year the AA/EO Officer will consider the effectiveness of this Policy Statement and evaluate the need for change. The AA/EO Officer will evaluate whether changes will promote nondiscrimination in employment/delivery of services. The AA/EO Officer shall maintain, for three years, records showing complaints filed, reviews conducted, investigations, decisions reached, corrective actions taken and the reason(s) for the decision. Annually, the AA/EO Officer will provide a summary report of all complaints filed under this policy to the Affirmative Action Committee. The Affirmative Action Officer will encourage our employees to incorporate the standards of this plan in their daily work practices.

### **Employment Relationship**

Nothing contained in this Policy Statement is to be construed by any employee as establishing, creating or constituting a written, oral or implied contract of employment. Furthermore, nothing herein shall be construed as a guarantee of continued employment nor as a guarantee of any benefits or conditions of employment.

The provisions set forth in this Policy Statement supersede prior personnel policies and procedures, whether written or established by past practice. Because this Policy Statement is based on operational policies and procedures, federal and state mandated policies and procedures, and present employee fringe benefit programs which are subject to change, this manual is also subject to change.

We reserve the right to revise, add, subtract, correct, delete or update any part or all of the materials in this Policy Statement.

Any changes made in this Policy Statement will be brought to the attention of all employees by employee meetings, posting of the change on the employee bulletin boards, or corrections in the Policy Statement itself.

### **Agencies' Endorsement and Commitment**

We, the undersigned representatives, are firmly committed to providing equal employment opportunities, affirmative action, and an equitable service delivery system. The undersigned agencies, their departments and personnel are responsible for implementing this policy.

We commit ourselves and our agencies to equal opportunity, affirmative action and an equitable service delivery system. We pledge to support and oversee the implementation of this equal opportunity/affirmative action policy statement in an equitable and fair manner.



We agree that the City of Eau Claire's Equal Opportunity/Affirmative Action Officer shall serve as our EO/AA Officer. The EO/AA Officer shall develop, implement and maintain our EO/AA plans and programs.

Dated: 10/27/10 City of Eau Claire  
By: [Signature]

Dated: 10/08/2010 L. E. Phillips Memorial Public Library  
By: [Signature]

Dated: 10/8/2010 Eau Claire City/County Health Department  
By: [Signature]

Dated: 10-8-2010 Housing Authority of the City of Eau Claire  
By: [Signature]

#### Equal Opportunity/Affirmative Action Officer's Endorsement

As the City's Equal Opportunity/Affirmative Action Officer, I pledge to implement this EO/AA policy statement, in a lawful, equitable and fair manner. I pledge to make this Policy Statement available to all employees, client/service recipients, groups, agencies, vendors, contractors, subcontractors and companies within the community. I also agree to serve as the EO/AA Officer for the agencies listed above.

Dated: 11-5-2010  
\_\_\_\_\_  
(Printed name of Equal Opportunity/Affirmative Action Officer)  
\_\_\_\_\_  
(Signature)



## **AFFIRMATIVE ACTION POLICY**

Our affirmative action efforts are intended to prevent unlawful discrimination of employees and client/service recipients.

### **Hiring**

We will identify ourselves as equal opportunity employers. We will use selection criteria, policies, and tests that indicate job skills, knowledge, aptitudes, and other job-related information. Our selection procedures will not unlawfully exclude applicants by age, race, creed, color, religion, physical or mental impairments, marital status, military service, gender, pregnancy, ancestry, use or non-use of lawful products off of our premises during non-working hours, national origin, sexual orientation, arrest record or conviction record.

We will seek to maintain the confidentiality of information collected for affirmative action/equal opportunity (AA/EO) purposes. It may, however, be used to document our affirmative action efforts, to inform supervisors and managers of work restrictions or necessary accommodations, to alert first aid or safety personnel to any conditions that require special emergency treatment, to help government officials investigate compliance with applicable regulations or any other non-discriminatory purpose.

### **Promoting and Transferring**

In promoting, transferring and making other employment-related decisions, applicants and employees will not be unlawfully discriminated against because of their age, race, creed, color, religion, physical or mental impairment, marital status, military service, gender, pregnancy, ancestry, use or non use of lawful products off of our premises during non-working hours, national origin, sexual orientation, arrest record or conviction record.

### **Filing Complaints**

All individuals with information concerning a possible violation of this Policy Statement, including Complainants, shall file a written complaint with the AA/EO Officer, Director of Human Resources or Agency Director within 30 days of the alleged violation. At their discretion, the AA/EO Officer, Director of Human Resources or Agency Director may extend the 30 day period if the Complainant so requests.

AA/EO complaints shall provide specific details of the alleged violation and offer a recommended solution. Upon receiving a complaint, the AA/EO Officer, Director of Human Resources or the Agency Director (or designee) shall promptly initiate an investigation of all AA/EO complaints. Investigations will be commenced within 10 business days unless extenuating circumstances exist. Investigators shall consider privacy concerns when conducting investigations. Investigators will

ordinarily question individuals having knowledge of either the specific allegation or similar matters. Investigators should document their findings.

After completing the investigation, the Officer/Director shall promptly notify the Complainant in writing of the findings of the investigation and the proposed resolution, if applicable. The findings and recommendations will ordinarily be provided within 10 business days unless extenuating circumstances exist.

#### **Retaliation Prohibited**

We will not retaliate against any individual for opposing practices that violate this Policy Statement or for filing a complaint, testifying or participating in any way in an investigation, proceeding or litigation. If an employee or client/service recipient believes that he or she is being retaliated against, that employee/client/service recipient shall follow the complaint and appeal process detailed above.

#### **Review and Record-keeping**

Each year the AA/EO Officer will consider the effectiveness of this Policy Statement and evaluate the need for change. The Affirmative Action Officer will evaluate whether changes will promote nondiscrimination in employment/delivery of services. The AA/EO Officer shall maintain, for three years, records showing complaints filed, reviews conducted, investigations, decisions reached, corrective actions taken and the reason(s) for the decision.

## WORKFORCE ANALYSIS

Biennially, we shall conduct a workforce analysis of the ethnic and sexual composition of our workforce. We shall list every job title according to the applicable collective bargaining agreement or our payroll records and rank each job from the lowest-paying to the highest-paying. We will create a table showing, for each job title, the wage rate, and our current workforce by gender, race, and national origin. After conducting the workforce analysis, we will conduct an availability analysis, based on the then most recent census statistics to determine the availability of females and minorities in the appropriate labor market for each job group. Specifically, we will determine the availability of minorities and females for each job group by examining and quantifying the following factors:

1. The minority population of the labor area in which we are located and the availability of females seeking employment in the labor area;
2. The percentage of minorities and females who are unemployed in our area.
3. The percentage of the minority and female workforce as compared with the local workforce in our area;
4. The availability of minorities and females possessing the requisite skills in our area;
5. The availability of minorities and females possessing the requisite skills in an area in which we can reasonably recruit;
6. The availability of promotable and transferable minorities and females in our organization;
7. The existence of training institutions capable of training persons in the requisite skills; and
8. The degree of training which we can reasonably be expected to provide in order to open additional job classifications to minorities and women.

After conducting the availability analysis, we will determine whether women or minorities are underutilized in any of the job groups in our work force. Underutilization exists if any of the job groups contain fewer minorities or women than would reasonably be expected considering their availability in the local labor market area.

If underutilization exists in any of our job groups, we will establish goals designed to correct such underutilization. We will set specific goals, designed to match the percentage representation of minorities and females to their availability for each of the job groups. We will also set timetables for achieving these goals and disseminate this information to our employees and the general public.



## **SEX DISCRIMINATION POLICY**

We will not unlawfully discriminate on the basis of gender. We adopt and agree to comply with the Equal Employment Opportunity Commission's guidelines on sex discrimination. These guidelines overrule any of our pronouncements or policies which are inconsistent with the Commission's guidelines or other laws or regulations. Our sex discrimination policy applies to all phases of employment and delivery of services.

### **Job Classification**

We will not classify jobs by gender or establish gender based lines of progression or seniority. We will not use classifications to disguise sex discrimination. Personnel involved in employment decisions will not unlawfully express gender-based preferences, limitations or specifications.

### **Bona Fide Occupational Qualification**

When gender is a bona fide occupational qualification, we may confine consideration of applicants to those of a specific gender. We will not refuse to hire an applicant because of his or her sex based on comparative employment characteristics of men or women, characteristics of the sexes or on consideration of the preferences of co-workers, supervisors, clients or client/service recipients.

### **Advertising Job Opportunities**

When advertising a position we will not indicate a gender preference, limitation or specification, unless gender is a bona fide occupational qualification for that position. Unless a position has a bona fide occupational qualification for a specific gender, we will not use employment agencies which refuse to represent both men and women.

### **Fringe Benefits**

In the event that we decide to provide a fringe benefit, we will provide male and female employees with comparable fringe benefits. The same benefits will be provided for spouses and families of employees, regardless of their sex or whether the cost of benefits for members of one gender is greater than for the other. Our fringe benefit programs, funds, and insurance will comply with the Equal Employment Opportunity Commission's then most recent guidelines.

### **Policies Relating to Pregnancy and Childbirth**

Impairments relating to pregnancy, childbirth, or other related medical conditions will be treated in the same way as other medical conditions. We will not discriminate against applicants or employees because of pregnancy, childbirth, or related medical conditions.

### Filing Complaints

All individuals with information concerning a possible violation of this Policy Statement, including Complainants, shall file a written complaint with the AA/EO Officer, Director of Human Resources or Agency Director within 30 days of the alleged violation. At their discretion, the AA/EO Officer, Director of Human Resources or Agency Director may extend the 30 day period if the Complainant so requests.

AA/EO complaints shall provide specific details of the alleged violation and offer a recommended solution. After receiving a complaint, the AA/EO Officer, Director of Human Resources or the Agency Director (or designee) shall promptly initiate an investigation of all AA/EO complaints. Investigations will be commenced within 10 business days unless extenuating circumstances exist. Investigators shall consider privacy concerns when conducting investigations. Investigators will ordinarily question individuals having knowledge of either the specific allegation or similar matters. Investigators should document their findings.

After completing the investigation, the Officer/Director shall promptly notify the Complainant in writing of the findings of the investigation and the proposed resolution, if applicable. The findings and recommendations will ordinarily be provided within 10 business days unless extenuating circumstances exist.

### Retaliation Prohibited

We will not retaliate against any individual for opposing practices that violate this Policy Statement or for filing a complaint, testifying or participating in any way in an investigation, proceeding or litigation. If an employee or client/service recipient believes that he or she is being retaliated against, that employee/client/service recipient shall follow the complaint and appeal process detailed above.

### Review and Record-keeping

Each year the AA/EO Officer will consider the effectiveness of this Policy Statement and evaluate the need for change. The Affirmative Action Officer will evaluate whether changes will promote nondiscrimination in employment/delivery of services. The AA/EO Officer shall maintain, for three years, records showing complaints filed, reviews conducted, investigations, decisions reached, corrective actions taken and the reason(s) for the decision.

## UNLAWFUL HARASSMENT AND SEXUAL HARASSMENT POLICY

We oppose sexual discrimination, sexual harassment and unlawful harassment on the basis of age, race, creed, color, religion, physical or mental status, military status, gender, pregnancy, ancestry, use or nonuse of lawful products off our premises during non-working hours, national origin, sexual orientation, arrest record, or conviction record in any area of employment or delivery of services. We prohibit verbal, physical, visual and sexual harassment. Verbal harassment includes racial, sexual, or ethnic jokes or insults. Physical harassment includes unwelcome touching, grabbing and pinching. Visual harassment includes sexually suggestive pictures, posters, photographs, or cartoons, as well as materials intended to reflect negatively on an individual's race, national origin, ancestry or sexual orientation.

Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when submission to or rejection of this conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance or creates an intimidating, hostile or offensive work environment.

Sexual harassment can occur in a variety of circumstances, including but not limited to the following:

- The victim as well as the harasser may be a woman or a man.
- The victim does not have to be of the opposite sex.
- The harasser can be another employee, the victim's supervisor or a supervisor in another area.
- The victim does not have to be the person harassed but can be anyone affected by the offensive conduct.
- Unlawful sexual harassment may occur without economic injury to or discharge of the victim.
- The harasser's conduct must be unwelcome.

Here are some examples of sexual harassment which we prohibit:

1. Explicit or implicit promise of career advancement in return for sexual favors (e.g., promotion, training, awards, job assignments, lax time-keeping, lower standards of performance);



2. Explicit or implicit threats that the victim's career will be adversely affected if the sexual demands are rejected (e.g., nonpromotion, poor performance appraisal, reassignment to a less desirable position/location);
3. Deliberate, repeated, unsolicited verbal comments, gestures or physical actions of a sexual nature (e.g., touching, pinching, or patting another person.)
4. Displaying sexually explicit photographs or making sexually explicit jokes.

We forbid our agents, supervisors, and employees from engaging in any form of sexual harassment. Substantiated violations may result in disciplinary action, including dismissal. Conduct or actions that arise out of a personal or social relationship that are not intended to have a discriminating employment affect may not be viewed as harassment. We reserve the right to determine whether such conduct constitutes sexual harassment, based on a review of the facts and circumstances of each situation. The AA/EO Officer will oversee a program informing employees of this policy. As part of this program, the policy will be posted and supervisory personnel will be specifically informed that they are responsible for working to prevent such unlawful harassment and to take appropriate action if it does occur.

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## **AGE DISCRIMINATION POLICY**

We will not use age as a basis to unlawfully discriminate against employees, job applicants or client/service recipients. In all other employment matters, applicants and employees will not be unlawfully differentiated by age. Applicants may be asked on application forms whether they are at least 18 years of age. No other inquiries shall be made regarding age and no age restrictions shall be placed upon a job unless the inquiry or restriction directly relates to a bona fide occupational qualification.

### **Programs and Activities**

Individuals will not be excluded from, denied the benefits of, or subjected to discrimination on the basis of age under a program or activity which receives Federal or State financial assistance, nor shall they be denied or limited in their opportunity to participate in such a program or activity. We may, however, offer special programs for older persons or for children.

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## **PERSONS WITH PHYSICAL OR MENTAL IMPAIRMENTS POLICY**

We will not unlawfully discriminate against qualified persons with physical and/or mental impairments. Our employment practices and service delivery systems will comply with all applicable governmental regulations. We will not refuse to hire or otherwise discriminate against a job applicant with an impairment who is capable of performing the essential functions of the job with or without reasonable accommodations.

In employing persons with physical or mental impairments, we will emphasize ability, relate employment to job performance, and seek to reasonably accommodate the physical needs of our employees. We will not use selection criteria, policy or tests that disadvantage applicants with physical or mental impairments unless the procedures are directly related to the position's essential functions. The criteria, policy, and tests will measure job skills and aptitudes, or other relevant factors, rather than reflecting the applicant's or employee's impaired sensory, manual, or speaking skills, except where those are the skills intended to be measured.

Applicants may be required to submit to medical examinations or evaluations, provided that such procedures are part of our regular employment procedure. Only job-related medical criteria will be considered in any job decision. Employees may voluntarily identify any impairment they have after they have been hired.

We will consider providing appropriate auxiliary aids to applicants, employees and clients/service recipients with impaired sensory, manual, or speaking skills when such aids are necessary to prevent a qualified person with a physical or mental impairment from being subjected to discrimination, being excluded from participating in, or being denied the benefits of a program or activity.

Clients/service recipients with a physical or mental impairment may receive a different or separate aid, benefit, or service only when such action is necessary to provide the individual with benefits or services provided to others. This does not mean, however, that the aid, benefit, or service must provide the client/service recipient with the identical result as persons without such impairments.

### Reasonable Accommodation

Unless an accommodation would impose an undue hardship, we will make reasonable accommodation for the known physical and mental limitations of qualified applicants or employees. We will consider a range of possible accommodations to provide individuals the opportunity to perform the essential functions of a job. We are not required to create new job positions (i.e. a "light duty" position).

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#### Retaliation Prohibited

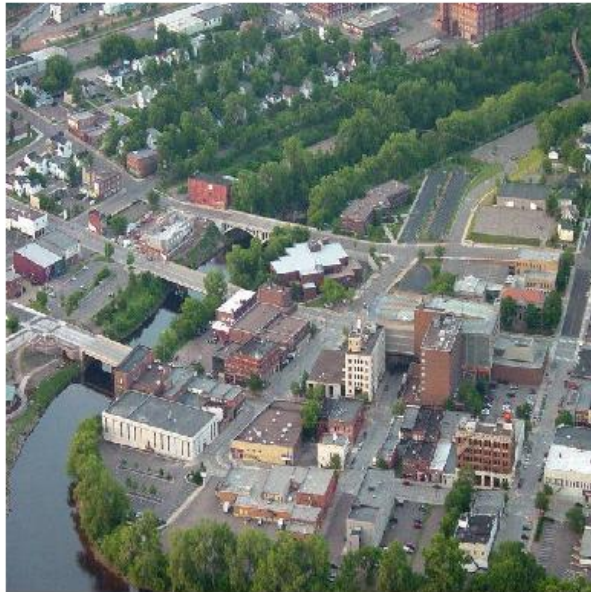
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**APPENDIX**

## Fair Housing Analysis of Impediments



2012

### City of Eau Claire: Analysis of Impediments to Fair Housing



Submitted by the  
Metropolitan  
Milwaukee  
Fair Housing  
Council

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## Author of the Report

This report was produced by the Metropolitan Milwaukee Fair Housing Council, Inc. (MMFHC). Kori Schneider Peragine, Carla Wertheim and Erika Sanders are the primary staff responsible for its content.

MMFHC was established in October 1977 as a private, non-profit organization dedicated to promoting fair housing throughout the State of Wisconsin by combating illegal housing discrimination and by creating and maintaining racially and economically integrated housing patterns. MMFHC operates the following four programs:

### Enforcement Program

- Intake of fair housing complaints and counseling on options for remedy.
- Investigative services for persons who allege housing discrimination.
- Referrals to attorneys and government agencies.
- Systemic investigations of institutional discrimination.

### Outreach and Education Program

- Presentations to consumers, advocates and the general public.
- Fair housing training for property owners and managers, real estate agents and other members of the housing industry.
- Fair housing technical assistance to government agencies, civil social service agencies and housing providers.

### Fair Lending Program

- Intake of fair lending complaints and counseling on options for remedy.
- Promotes fair lending and seeks to eradicate predatory lending practices through a community coalition, the Strategies to Overcome Predatory Practices (STOPP) Initiative.
- Monitoring of financial institutions' fair lending practices.
- Technical assistance and education for lenders and the general public.

### Inclusive Communities Program

- Technical assistance and professional support to community organizations, developers and local policy makers on inclusionary housing policies and the promotion of racial and economic integration.
- Assistance with consumers' access to pro-integrative housing choices.
- Research, analysis and documentation of fair and affordable housing opportunities and impediments.



MMFHC provides services throughout the State of Wisconsin through three offices. Its main office is located in the City of Milwaukee and satellite offices of the organization are located in Madison (Fair Housing Center of Greater Madison) and Appleton (Fair Housing Center of Northeast Wisconsin).

This Analysis of Impediments to Fair Housing report was funded by the City of Eau Claire.

The Nonprofit Center of Milwaukee's Data Center provided MMFHC with mapping services, data analysis and other technical assistance.

## Executive Summary

This report, City of Eau Claire: Analysis of Impediments to Fair Housing 2011, should be used as a planning tool to ensure equal housing opportunities for all persons in the City of Eau Claire. The report has three main components: an analysis of demographic and economic characteristics in relation to their impact on fair housing; a description of fair housing impediments; and recommendations designed to dismantle impediments.

### Demographic and Economic Characteristics

An analysis of the demographic and economic characteristics in the City of Eau Claire identifies trends that currently have or will have an impact on the housing market and impediments to fair housing choice. Some items of note include:

According to the 2010 Census, Eau Claire's population in 2010 was 65,883, an increase of 6.8% from 2000.

Nonwhite residents in Eau Claire increased between 2000 and 2010: The Hispanic population increased by almost 105%; Asian population had an increase of 32.5%; African American population increased by 68.5%; white residents comprise 90.3% of the City's population, a decrease of 3.1% of the City's total population since 2000.

Minority households tend to be larger than white households; as a result, they are more likely to require larger housing units. In 2000 white households have an average household size of 2.3 persons in Eau Claire; Asians have an average household size of 5.2 persons; Latinos have an average household size of about 2.6 persons; and African Americans have an average of about 2.7 persons per household.

According to the 2000 U.S. Census, 16% of Eau Claire's population has a disability (including physical disabilities, mental disabilities, mobility disabilities and "other").

In 2010, only 25.6% of African Americans, 16.6% of Latinos, and 42% of Asians owned their homes. The homeownership rate for whites was more than two times that, at 56.8%.

The median age for Eau Claire residents was 28.5 years in 2009. Median age by race and ethnicity varies significantly in Eau Claire: whites (30), Asians (20.9), Latinos (20.6), and African Americans (23.8).

The 2009 ACS reported Eau Claire's median household income at \$39,858. The 2009 ACS reported white household income at \$40,535, black at \$29,306, Latino at \$27,326, and Asian at \$30,000<sup>1</sup>.

<sup>1</sup> Margins of error on median income by race and ethnicity are significant - from +/- \$16,000 up to +/- \$37,000. This is due to the small sample size of nonwhite populations.

According to the 2009 ACS, 6.2% of Eau Claire households do not have a vehicle available. In May 2011, the median home value in Eau Claire was \$114,900.

According to the 2009 ACS, 92% of city residents 25 years and older graduated from high school. Vast disparities in educational attainment are revealed when analyzed by race and ethnicity. For instance, Latinos (67.7%), Asians (61.5%) and African Americans (71.3%) are significantly less likely to have a high school diploma than whites (93.3%).

Almost 6% of Eau Claire's population speaks a language other than English at home. About 2.4% of the population does not speak English very well.

### Fair Housing Impediments

An impediment to fair housing is anything that may hinder or prevent a person from having equal access to housing because of their membership in a federal or State of Wisconsin protected class.<sup>2</sup> Impediments may take the form of a governmental entity's policy, practice or procedure; housing industry practices; and other societal factors that may contribute to impeding a person or family from obtaining housing. Impediments in the report fall into one or more of three categories: City of Eau Claire impediments, state and federal impediments, and private market impediments. Though the City may have limited ability to address impediments in the private market and at the state and federal levels, this report would be incomplete without listing them.

#### City of Eau Claire Impediments

##### Impediment #1: Flawed City Fair Housing Ordinance

Features of the City's fair housing ordinance that create impediments to fair housing in Eau Claire include: the ordinance does not provide comprehensive protections on the basis of familial status (also called "family status") or sexual orientation; the ordinance is unclear regarding persons protected under the ordinance; the ordinance fails to provide comprehensive listing of prohibited acts; the ordinance lacks adequate protection for persons with disabilities; the ordinance does not prohibit discrimination in all areas of the housing market; the ordinance is silent on the enforcement process, including statute of limitations; the ordinance provides negligible penalties for violations of the law; and the ordinance does not allow victims of illegal housing discrimination to obtain compensatory or injunctive relief.

##### Impediment #2: Lack of Housing Units Accessible to Persons with Disabilities

Nearly 16% of Eau Claire's population has a disability (including physical disabilities, mental disabilities, mobility disabilities and "other"). Eau Claire has a large proportion of older housing

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<sup>2</sup> Protected classes listed in the Federal Fair Housing Act and the Wisconsin Open Housing Law include race, religion, color, national origin, sex, disability, familial status, marital status, sexual orientation, ancestry, age, status as a victim of domestic abuse, sexual assault and stalking, and lawful source of income.

stock; 38% of the City's housing was built in 1959 or earlier. Older housing units are less likely to be accessible to persons with physical disabilities; however, they are also more likely to be affordable. Newer dwellings are more likely to be accessible, but are typically less affordable.

#### Impediment #3: Inadequate Affordable Housing Supply Relative to Resident Income

A shortage of affordable housing may not appear to be a fair housing issue on its face. However, the negative impact that lack of affordability has particularly on persons with disabilities, people of color, families with children or the elderly cannot be ignored.

#### The Lack of Financial Resources to Preserve, and/or Rehabilitate Affordable Housing

The shortage of affordable housing is attributable, in part, to a lack of resources to preserve such units in Eau Claire. CDBG and HOME funds are used to build, preserve and rehabilitate housing in the City. However, the demand for these resources exceeds their availability.

#### Structural Quality of Housing

According to the City of Eau Claire's Consolidated Plan for 2010-2014, large households are the most likely to have housing problems such as cost burdens and substandard housing. Additionally, the Consolidated Plan indicated that the conversion of large single-family houses into apartments reduces the supply of large units and increases overcrowding.

#### Impediment #4: Poor Credit, Lack of Credit History and Lack of Financial Literacy

Poor credit history, whether incurred by personal choices or circumstances beyond a person's control, can hinder a person's access to housing.

#### State and Federal Housing Policy Impediments

While the City of Eau Claire is indirectly involved in these state and federal impediments, they must be addressed, as they impact the City's ability to "affirmatively further fair housing."<sup>3</sup> State and federal impediments include:

#### Impediment #5: Frequent Attacks on the Community Reinvestment Act (CRA) by Banking Regulators

CRA regulators submit proposals to weaken the Community Reinvestment Act (CRA). Weakening CRA would be problematic because the provisions of CRA encourage depository

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<sup>3</sup> Affirmatively further fair housing (AFFH) is a requirement for communities receiving HOME, CDBG and other federal funds. HUD has not defined AFFH statutorily.

institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income neighborhoods.

**Impediment #6: Lack of Resources/Incentives for Developers to Build for the Lowest Income Households**

Resources for the building of new rental housing have lagged far behind the demand, resulting in the shortage of affordable rental housing in many communities.

**Impediment #7: Wisconsin Housing and Economic Development Authority (WHEDA): LIHTC Allocation Scoring Limits Housing Opportunities**

WHEDA's tool for scoring LIHTC applicants, the Qualified Allocation Plan (QAP), gives preference to development projects that have local community support. So those communities that have a shortage of affordable housing can continue to deny its development, even though there is a need for it.

**Private Market Impediments**

Private market impediments are obstacles to fair housing in the housing production, mortgage lending, homeowners' insurance, rental and home sales markets. Though the City of Eau Claire is limited in its ability to directly address private market impediments, it can take a leadership role in bringing these issues to the public's attention and supporting fair housing enforcement and education efforts in the private market.

**Impediment #8: Mortgage Lending**

**Discrimination in the Lending Market**

Discrimination in mortgage lending prevents or impedes home seekers from obtaining the financing normally required to purchase a home. No evidence of lending discrimination exists in Eau Claire; however most evidence of lending discrimination is uncovered from systemic investigations. No such investigations have taken place in Eau Claire.

**Foreclosures**

Foreclosures of single-family homes are a serious threat to neighborhood stability and community wellbeing, particularly low income neighborhoods. In June 2011, RealtyTrac reported that 1 in every 1,189 Eau Claire County housing units received a foreclosure filing. Eau Claire is faring better than other communities in the state of Wisconsin, but the foreclosure rate still bears scrutiny

#### Impediment #9: Homeowners Insurance

##### Discrimination in the Homeowners Insurance Market

Homeowners insurance is a requirement for a home mortgage; therefore, the impact of discrimination in the insurance industry is reflected in racial and ethnic homeownership rate disparities. Racial discrimination in the provision of insurance not only denies fair housing choice, but also fosters disinvestment and the deterioration of neighborhoods.

#### Impediment #10: Housing Sales and Rental Markets

##### Discrimination in the Sales and Rental Markets

A major impediment to housing choice is discrimination in the sale and rental of housing. In Eau Claire discrimination based on a disability remains the major complaint filed with HUD.<sup>4</sup> The protected classes of race and family status are also among the complaints most frequently taken by HUD.

##### Lack of Spanish and Hmong-speaking Real Estate Brokers

With the burgeoning Hmong and Spanish-speaking populations in Eau Claire, it is important to ensure an equal level of service be available to alleviate this impediment to fair housing choice.

#### Recommendations

Recommendations to remedy the identified barriers to fair housing are the most critical element of this document. The recommendations are presented in three categories: City of Eau Claire recommendations, state and federal policy recommendations and private market recommendations.

##### City of Eau Claire Recommendations

Create and Implement a Comprehensive Strategy for Production of Affordable and Accessible Housing

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<sup>4</sup> The Wisconsin Equal Rights Division received 12 complaints from Eau Claire County from January 1, 2005 to May 23, 2011. Of those 12 complaints, 6 were rejected and 6 were investigated. Of the 6 investigated 4 were deemed "no probable cause", 1 was deemed "probable cause" and the final was deemed "untimely filed". The "probable cause" complaint's basis was source of income. The bases for the "no probable cause" complaints were a combination of : 2 disability, 2 race, 1 creed, 1 color, 1 ancestry and 1 sex.

The strategy should include the following components: funding an affordable/accessible housing production task force; incorporating visitability and home modification requirements into City subsidies/funding; funding visitability and accessibility outreach and education; identifying and overcoming housing production impediments; creating a citywide housing trust fund; and utilizing Tax Incremental Financing (TIF) to produce accessible and affordable housing.

#### **“Affirmatively Further Fair Housing” and “Section 3” Requirement Education**

Local nonprofits and developers who are subrecipients of federal CDBG and HOME funds are not adequately aware of their responsibilities and obligations regarding “affirmatively furthering fair housing”<sup>5</sup> and Section 3,<sup>6</sup> a hiring policy. The City should incorporate education on Section 3 and “affirmatively furthering fair housing” requirements into funding meetings with its CDBG and HOME subrecipients.

#### **Support Comprehensive Fair Housing Services**

The City should research fair housing service provider options (conducting housing discrimination complaint intake, case management, investigation and legal referral services to victims of discrimination; investigations of systemic forms of illegal discrimination; and outreach and education throughout the community). Additional components of a comprehensive fair housing program are training for city staff and elected officials and outreach to linguistically isolated and bilingual communities.

#### **Fund Consumer Education**

The City of Eau Claire should continue to work with Western Dairyland, Catholic Charities and UW-Extension to provide financial literacy services to the community. Improved credit of home seekers will improve chances of securing safe and affordable housing. Additionally, renter education should be provided to assist potential renters in finding and keeping decent housing.

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<sup>5</sup> FHA requires HUD to “administer [housing] programs...in a manner affirmatively to further the policies of [the Fair Housing Act],” including the general policy to “provide, within constitutional limits, for fair housing throughout the United States.” 42 USC §3608(e)(5). A grantee is “required to submit a certification that it will affirmatively further fair housing, which means that it will (1) conduct an analysis to identify impediments to fair housing choice within the jurisdiction; (2) take appropriate actions to overcome the effects of any impediments identified through that analysis; and (3) maintain records reflecting the analysis and actions in this regard.” 24 C.F.R. § 570.601(a)(2) , 24 CFR § 91.225(a).

<sup>6</sup> Section 3 is a means by which the Department of Housing and Urban Development (HUD) fosters local, economic improvement, and individual self-sufficiency. Section 3 is the legal basis for providing jobs for residents and awarding contracts to businesses in areas receiving certain HUD financial assistance.



#### Produce an Annual Report of Lending Practices

The City Comptroller's Office should produce and distribute an annual report of lending activity in the city.

#### Review and Amend Local Fair Housing Ordinance

The Eau Claire fair housing ordinance should be amended to include definitions of "disability" as well as each of the protected classes.

The ordinance should be amended to unambiguously prohibit discrimination in the provision of homeowners insurance and all facets of the financing of housing.

The ordinance must be amended to ensure that it provides viable enforcement options for victims of housing discrimination and to include specific penalties for violations of the law. Those penalties should be increased to provide a true punitive and deterrent effect, consistent with civil forfeitures delineated in federal and state fair housing laws. The ordinance should also be amended to include relief for victims of housing discrimination in the form of compensatory and injunctive relief.

#### Amend Zoning Ordinance Regarding Community Living Arrangements

The City should partner with disability advocacy groups, such as Center for Independent Living for Western Wisconsin and others, to review and analyze the Community Living Arrangements section of its zoning ordinance

#### State and Federal Recommendations

Advocate for Changes in State and Federal Programs to Expand Affordable Housing Options - Specifically by advocating for additional Section 8 Housing Choice Vouchers and advocating for revisions to WHEDA's Low Income Housing Tax Credit (LIHTC) Program allocation scoring.

#### Private Market Recommendations

##### Advocate for Open and Inclusive Real Estate and Rental Markets

Eau Claire should advocate for more open and inclusive home rental and sales markets by working with the housing industry by encouraging housing providers to seek fair housing training; encouraging greater efforts on the part of the lending, real estate and rental industries to hire and train minority and bilingual lenders, underwriters, real estate and rental professionals;



and promoting more active participation by providers of rental housing in local rent assistance programs to expand locational choice for low-income and minority residents.

## Introduction

The Analysis of Impediments to Fair Housing is a report required by the U.S. Department of Housing and Urban Development (HUD) from communities that receive Community Development Block Grant (CDBG) funds. However, to maximize the potential of this report, City officials must view it as more than just a requirement for receiving block grant funding. It should be used as a meaningful tool enabling the community to take steps to ensure equal access to housing opportunities for all persons in the City of Eau Claire.

According to Carolyn Peoples, former Assistant Secretary of HUD's Fair Housing and Equal Opportunity Office, "Once the jurisdiction completes the AI, it must report on its implementation by summarizing the impediments identified in the analysis and describing the actions taken to overcome the effects of the impediments identified through the analysis in its Consolidated Annual Performance and Evaluation Report (CAPER). Although AIs are not submitted or approved by HUD, each jurisdiction should maintain its AI and update the AI annually where necessary. Jurisdictions may also include actions the jurisdiction plans to take to overcome the impediments to fair housing choice during the coming year in the Annual Plan that is submitted as part of the Consolidated Plan submission."

### Fair Housing

Fair housing is a civil right that guarantees equal housing opportunities for all persons regardless of their membership in categories called "protected classes." Protected classes under federal and state fair housing laws are listed in the following table.

Federal Fair Housing Act Protected Classes	Wisconsin Open Housing Law Protected Classes
<p>Race – A person's race or the race of persons with whom one associates.</p> <p>Color – A person's skin color.</p> <p>Sex – A person's sex, including sexual harassment or intimidation.</p> <p>National Origin – The country of one's birth and/or the nationality of one's ancestors.</p> <p>Religion – A person's religious beliefs or denominational affiliation.</p> <p>Disability/Handicap – A physical or mental impairment that substantially limits one or more major life activities.</p> <p>Family/Familial Status – Household composition, including the presence of children.</p>	<p>State law includes all federal protections, plus:</p> <p>Age – Persons 18 years of age and older.</p> <p>Ancestry – The country of one's birth and/or the nationality of one's ancestors.</p> <p>Marital Status – Married, single, divorced, widowed or separated.</p> <p>Lawful Source of Income – A person's legal means of income, including such subsidized forms as Social Security, Food Stamps, Unemployment Compensation, etc.</p> <p>Sexual Orientation – Heterosexuality, homosexuality and bisexuality.</p> <p>Domestic Abuse, Sexual Assault and Stalking Victims – Persons who have been or are victims of domestic abuse, sexual assault or stalking.</p>

An impediment to fair housing is anything that may hinder or prevent a person from having equal access to housing because of their membership in a protected class. Impediments may take the form of a city or other governmental entity's policy, practice or procedure, housing industry practices, or other societal factors.

#### Scope of the Study

The City of Eau Claire: Analysis of Impediments to Fair Housing contains several components. First, the study provides an analysis of demographic and economic characteristics in relation to their impact on fair housing. Included are descriptions of Eau Claire's racial and ethnic composition, household profiles, population of persons with disabilities, homeownership, age distribution, employment and income levels, poverty, unemployment patterns, transportation, housing supply characteristics, education and linguistic isolation. Next, the report identifies impediments to fair housing. Impediments are organized into three broad categories: City of Eau Claire impediments, federal and state impediments, and private market impediments. Then, this report lists recommendations for dismantling the impediments to fair housing choice. In the final section, the City's implementation strategy - a road map for enacting this report's recommendations - is outlined.

## Demographic and Economic Characteristic Analysis: Fair Housing Implications

Eau Claire's current housing conditions are created by a complex combination of factors, including:

- illegal discrimination in the housing market,
- geographic preferences of home seekers,
- demographic shifts,
- changes in the number and structure of households, and
- trends in the larger economy.

Eau Claire's demographic, economic and social characteristics will be discussed in this section of the study, with emphasis on characteristics related to impediments to fair housing choice in the housing market.

In 2010, the Eau Claire submitted a Consolidated Plan for Community Development Block Grant, HOME and Housing Programs for the years 2010-2014. This document contains a useful summary of 2000 and 2010 census data and 2005-2009 American Community Survey (ACS) data for the City of Eau Claire and was used as a source for much of the demographic data in this section. Additional data and geographic information science (GIS) maps were also used in this report to map socioeconomic and housing market conditions and assist in highlighting patterns that may otherwise go unnoticed.

**Table 1: Eau Claire Population Distribution, 1990 - 2010**

	1990 Population	2000 Population	2010 Population
<b>City of Eau Claire</b>	56,856	61,704	65,883
<b>Eau Claire County</b>	85,183	93,142	98,736
<b>Chippewa County</b>	52,360	55,195	62,415

Source: 1990, 2000, and 2010 U.S. Census

The City of Eau Claire is located within both Eau Claire and Chippewa Counties. According to the 2010 Census, Eau Claire's population in 2010 was 65,883, an increase of 6.8% from 2000. The population of the Eau Claire County was 98,736 in 2010, an increase of 6% from 2000. Chippewa County's population, while still smaller than that of Eau Claire County, increased at a

higher rate, by 13%. Since 1990, the City of Eau Claire has maintained a constant 67% of Eau Claire County's population.

### Racial Composition

An examination of demographic changes reveals increases in nonwhite residents in Eau Claire between 2000 and 2010:

The Hispanic population increased by almost 105%.

The Asian population had an increase of 32.5%.

The African American population increased by 68.5%.

White residents comprise 90.3% of the City's population, a decrease of 3.1% of the City's total population since 2000.

The race and ethnicity proportions of Eau Claire Public Schools vary from the overall population and may be a predictor of the City's future demographic. For instance, the Asian American school population is 9.8% of the school population versus 4.6% of the total population. African Americans make up 3.4% of the school population versus 1.1% of the total population. The Hispanics represent 2.4% of the school population versus 1.9% of the total population. The white school population is 83.3% of the school population versus 90.3 of the overall population.

The Asian American population in Eau Claire is predominately Hmong, and "[t]he arrival of the Hmong to Eau Claire over the past thirty years has introduced the city to its first significant ethnic minority population."<sup>7</sup>

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<sup>7</sup> Christian, Jenna; Moua Pa Sia Low; Vogeler, Ingolf; Wisconsin Geographer Volume 23(2008-2009); The Cultural Landscape of the Hmong in Eau Claire, WI

**Table 2 : City of Eau Claire Population by Race Over Time**

Race	1990		2000		2010	
	Population	%	Population	%	Population	%
White	54,042	95.1	57,657	93.4	59,499	90.3
African American	211	0.4	429	0.7	723	1.1
American Indian	332	0.6	337	0.5	327	0.5
Asian or Pacific Islander	2,150	3.8	2,282	3.7	3,023	4.6
Other Race	121	0.2	209	0.3	35	0.1
Two or More Races	NA	NA	790	1.2	1,008	1.5
<b>Total</b>	<b>56,856</b>		<b>61,704</b>		<b>65,883</b>	

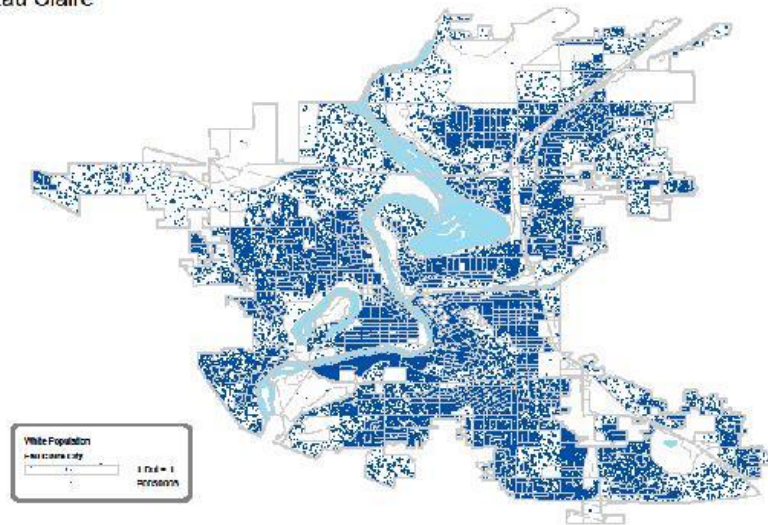
  

Latino/ Hispanic	343	0.6	619	1.0	1,268	1.9
Not Hispanic	56,513	99.4	61,085	99.0	64,615	98.1
<b>Total</b>	<b>56,856</b>		<b>61,704</b>		<b>65,883</b>	

Source: 1990, 2000, and 2010 U.S. Census

**Map 1: Dot Density for White population**

Population Density  
Eau Claire



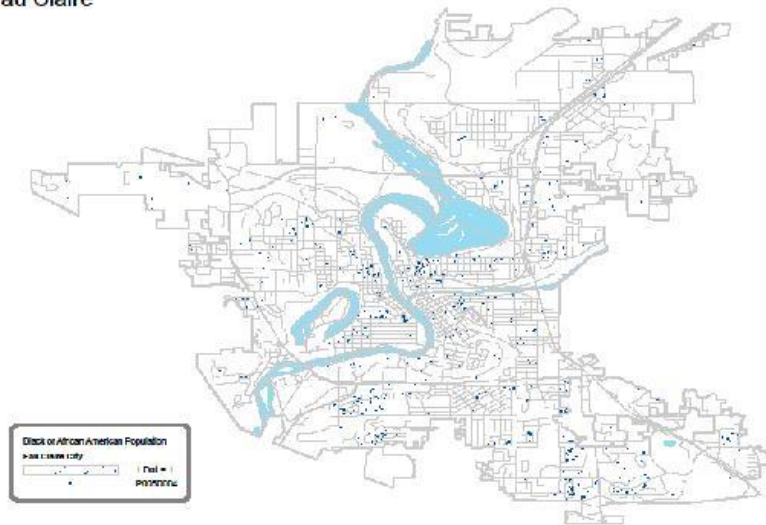
Source: U.S. Census 2010 P0000003 US 11

Nonprofit Center of Minnesota - 2011



**Map 2: Dot Density for African American population**

Population Density  
Eau Claire

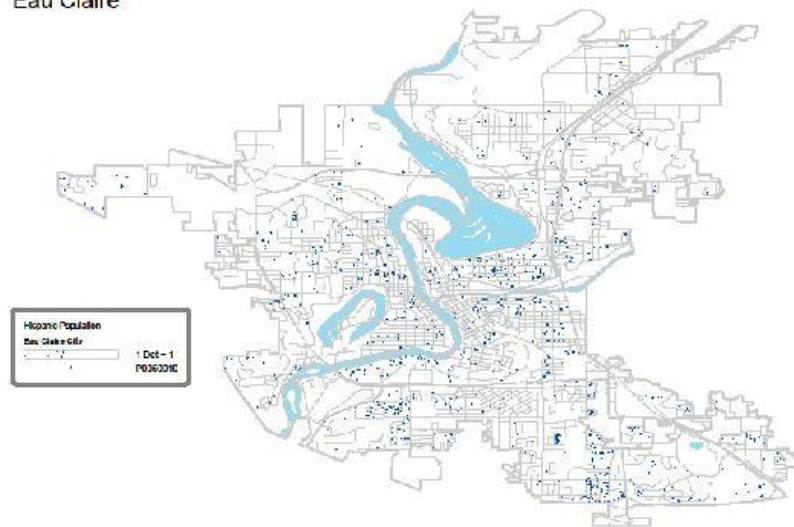


Source U.S. Census 2010 P000004 03 9

MapData: 2010 03 03 000000 0000

**Map 3: Dot Density for Latino population**

Population Density  
Eau Claire

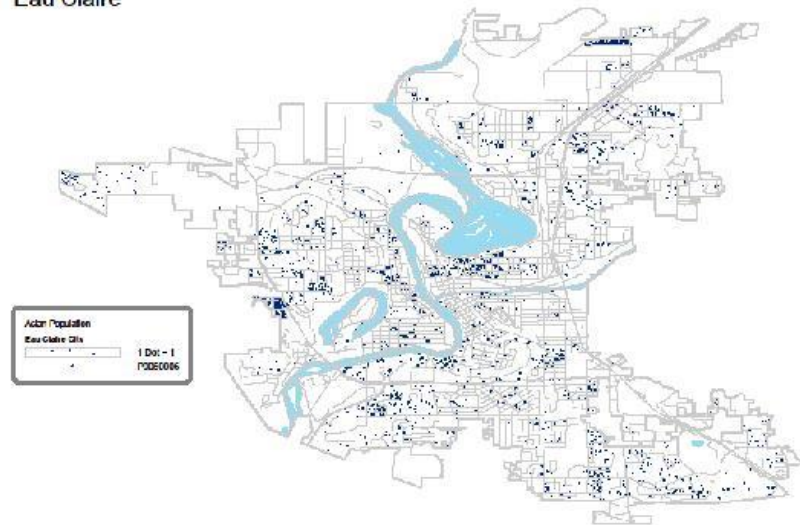


Source: U.S. Census 2010 P 5-P0050010 03 0

WATERBURY COUNTY GIS SERVICES - 7/2011

Map 4: Dot Density for Asian population

Population Density  
Eau Claire



Source U.S. Census 2010 P0050006 03 9

MapScale: 1 inch = 1 mile

Legally sanctioned discriminatory housing practices created segregated and unequal neighborhoods and communities throughout the United States. Although discrimination is no longer legal, it is still an endemic problem.

### Household Profiles

Throughout much of the U.S., an increase in the number of households is occurring at a rate that exceeds population growth. This is due to a variety of factors, including the growing number of single person and single parent households, longer life expectancies and the rate of divorce. A result of this trend is smaller household size. Consider:

The number of households in Eau Claire increased from 24,016 to 26,803 between 2000 and 2010, or 11.6%.

The average household size decreased from 2.38 persons to 2.29 persons.

One-person households increased significantly, by 15.2%, or 1095 households between 2000 and 2009.

Two-person households also increased by 12.8%, or 1073 households, during the same time period.

Households of four or more people decreased during this time by 267 households, or 5.5%.

Minority households tend to be larger than white households; as a result, they are more likely to require larger housing units. In 2000:<sup>8</sup>

White households have an average household size of 2.3 persons in Eau Claire.

Asian Americans households are more than two times that of white households with an average household size of 5.2 persons.

Latinos have an average household size of about 2.6 persons.

African Americans have an average of about 2.7 persons per household.

In comparison, the average household size in Wisconsin 2.5 persons and the U.S. is 2.6 persons.

Although average household size declined, many households continue to live in overcrowded households. The traditional census definition of overcrowded household is a household that has

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<sup>8</sup> The 2005-2009 American Community Survey did not include this data by race/ethnicity because the sample size was too small.

more persons than the number of rooms it occupies.<sup>9</sup> According to the 2009 American Community Survey, 1.3% of the City's households were overcrowded. According to the 2009 American Community Survey, African American (20.1%) and Asian American (16.5%) households are significantly more likely to be crowded than white (0.8%) and Latino (0%) households.

Families may find 'house partners' necessary to meet the cost of housing, which can result in overcrowding. In addition, the "married-couple family" now makes up 15.8% of the City's households. Almost one in five households (19.4%) is headed by a female with "no husband present."

**Table 3: Eau Claire Household Size, 2000 - 2009**

Household Size	2000 Percent	2009 Percent
1 Person	7202	8297
2 Person	8395	9468
3 Person	3602	4015
4 or More People	4817	4550
Total	24,016	26,330
Average Household Size	2.38	2.29

Source: 2000 U.S. Census and 2009 American Community Survey

## Persons with Disabilities

Housing stock with inaccessible features impedes access for persons with many different types of physical disabilities. Ensuring an adequate supply of accessible housing to meet the needs of persons with disabilities must be a City goal. While the actual number of accessible private housing units is not available, multiple sources<sup>10</sup> indicate that demand for such housing is greater

<sup>9</sup> Bathrooms and hallways are not included.

<sup>10</sup> Based on interviews with representatives from the Center for Independent Living for Western Wisconsin, Realtors Association of Northwest Wisconsin, and the Eau Claire School District.

than the supply. According to the 2000 U.S. Census, 16% of Eau Claire's population has a disability (including physical disabilities, mental disabilities, mobility disabilities and "other").<sup>11</sup>

Persons with disabilities are more likely to be unemployed or employed in lower paying jobs. Based on income data as well as interviews with representatives of the Center for Independent Living for Western Wisconsin, it is very evident that persons with disabilities are proportionally more in need of affordable housing than those without disabilities. According to the 2009 American Community Survey, 10% of the State of Wisconsin's population was below the poverty line, and 27.7% of the population with a disability was below the poverty line. The combined need for housing that is both accessible and affordable poses great challenges for many.

## Homeownership

**Table 4: Eau Claire, Renter/Homeownership Proportion, 2010**

	2000		2010	
	Number	Percent	Number	Percent
<b>Total Housing Units</b>	24,895	100%	28,134	100%
<b>Occupied</b>	24,016	96.5	26,803	95.3
<b>By Owner*</b>	13,759	57.3	14,779	55.1
<b>By Renter*</b>	10,257	42.7	12,024	44.9
<b>Vacant</b>	879	3.5	1,331	4.7

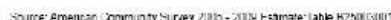
\* Of All *Occupied* Housing Units

Source: 2000 and 2010 U.S. Census

The homeownership rate in Eau Claire in 2010 was 55%. About 45% of Eau Claire' households rented. Homeownership rates by race and ethnicity show significant disparities. In 2009, only 25.6% of African Americans and 16.6% of Latinos owned their homes. The homeownership rate for whites was more than two times that, at 56.8%. Almost 42% of Asians owned their homes, thus faring slightly better than other minority groups. As home equity is often the foundation for educational, employment and business opportunities, these disparities disadvantage minorities. Impediments to homeownership are impediments to fair housing.

<sup>11</sup> 2009 American Community Survey defines "disability" differently and therefore reports the percentage of persons in the City of Eau Claire with disabilities as 9.9%. The technical explanation of these difference can be found at [http://www.census.gov/hhes/www/disability/disab\\_defn.html#00census](http://www.census.gov/hhes/www/disability/disab_defn.html#00census)



Housing Tenure  
Eau Claire

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In 2009, 15.2% of the City's population was 60 and older. The aging of Eau Claire's population has several fair housing-related repercussions. As the population ages, there will be a corresponding need for increased enforcement of fair housing laws' accessibility provisions, as well as education for this population so that elderly persons are aware of their accessibility-related fair housing rights. In addition, housing providers and developers will require increased access to education regarding their responsibilities to provide accessible housing.

13



The median age for whites was 30.

Asians had a median age that is 30.3% below that of whites, or 20.9.

Latinos had a median age that is 31.3% below whites, or 20.6.

The median age of African Americans was 20.7% lower than whites, or 23.8.

The significantly younger median age of minority households presents many implications for future and current housing needs. Currently, larger units are needed to accommodate larger families with children. The younger median age of persons of color suggests that many of these persons are children, likely not yet owning or renting their own housing. Future implications of the younger median age are clear. As the children of these families become adults, they may continue and amplify the trends their parents and grandparents experienced: a strong need for affordable housing and larger housing units.

#### Employment, Income and Poverty

The City of Eau Claire's unemployment rate has increased in recent years.<sup>12</sup> Fully 4.5% of the City's labor force was unemployed at the time of the 2009 American Community Survey (ACS). By 2011, the rate had increased to 6.6%.<sup>13</sup> The national unemployment rate is 9.1% and Wisconsin's is 7.4%.

When unemployment rates are analyzed by race there are stark differences between whites and nonwhites. African American residents (20.4%) and Asian Americans (5.9%) of Eau Claire are almost more likely to be unemployed than whites (4.2%). Hispanics unemployment is lower than that of whites (3.4%).

According to the 2000 Census and the 2009 ACS, poverty in Eau Claire increased significantly, from 13.6% to 18.7%. The African American (44%) and Asian American (35.5%) poverty rates in Eau Claire are more than 2 times the rate for whites (17.3%). The Latino poverty rate is 27.5%. Clearly, Eau Claire's employment and housing landscapes are working to much greater advantage for whites than for Asians, African Americans, and Latinos.

<sup>12</sup> An unemployed person is someone in the labor force not working but actively seeking employment.

<sup>13</sup> 2011 Wisconsin Bureau of Labor Statistics

City median incomes by race and ethnicity further illustrate this disparity. The 2009 ACS reported Eau Claire's median household income at \$39,858. The 2009 ACS reported white household income at \$40,535 was significantly higher than that of black (\$29,306), Latino (\$27,326), and Asian (\$30,000) households in the City<sup>14</sup>.

### Spatial Mismatch

As noted above, the unemployment rate in the City of Eau Claire was 6.6% in May of 2011. According to the 2009 ACS, 6.2% of Eau Claire households do not have a vehicle available. This increases challenges to accessing housing and employment opportunities. While the ACS did not categorize households without a vehicle by race and ethnicity, we assume based on other disparities that these populations are disproportionately affected by this impediment.

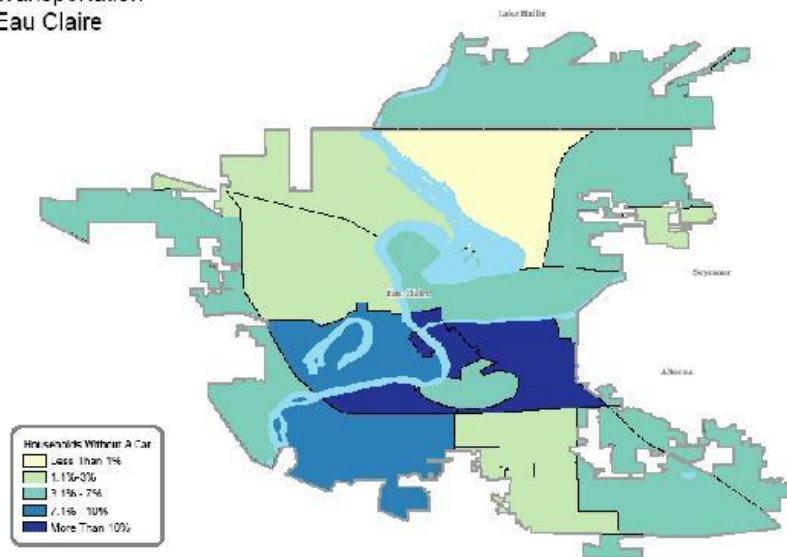
Map 6 below illustrates Eau Claire households without cars.<sup>15</sup>

<sup>14</sup> Margins of error on median income by race and ethnicity are significant - from +/- \$16,000 up to +/- \$37,000. This is due to the small sample size of nonwhite populations.

<sup>15</sup> Census tracts with very small populations, like the tract the airport is located in, may overemphasize the nature of the spatial mismatch for that tract.

**Map 6: City of Eau Claire Households Owning Vehicles, 2009**

Transportation  
Eau Claire



Source: American Community Survey 2005 - 2009 Estimate Table D25048

Source: Center of Statistics - 2011

## Housing Supply Characteristics

In May 2011, the median home value in Eau Claire was \$114,900, compared to \$150,000 for the U.S. and \$136,000 for Wisconsin.<sup>16</sup>

<sup>16</sup> The median home value is based on sales in Eau Claire County. <http://www.eppraisal.com/eau-claire-wi/home-values.mvc>

**Table 5: City of Eau Claire Housing Units by Year Structure Built, 2009**

<b>Year Built</b>	<b>Number</b>	<b>Percent</b>
Before 1940	5351	19.2
1940 to 1949	2141	7.7
1950 to 1959	3277	11.7
1960 to 1969	2695	9.7
1970 to 1979	4899	17.5
1980 to 1989	2961	10.6
1990 to 1999	3674	13.2
2000 to 2004	2359	8.4
2005 or later	562	2
<b>Total</b>	<b>27,919</b>	<b>100.0%</b>

Source: 2009 American Community Survey

Over 38% of Eau Claire's housing was constructed before 1959; 29.2% was built between 1960 and 1979; and 34.2% was built after 1980. In general, older housing stock is often less expensive, because it is more likely to be in disrepair or have greater maintenance needs, but it is also more likely to be inaccessible to persons with disabilities.

The Eau Claire City-County Health Department reported that building code citations declined from 101 in 2006 to 45 in 2010. According to home inspection data from Health Department from February 2010 to August 2011, there were 119 home inspections in the CDBG targeted area. On average, there were just over 9 interior violations and just over 2 exterior violations per inspection. Further, over half the homes had weatherization and smoke detector violations.

**Table 6: City of Eau Claire, Housing Unit Size, 2009**

Bedrooms	2009	
	Number	Percent
None	405	1.5
1	3727	13.3
2	8910	31.9
3	10068	36.1
4	3808	13.6
5 or more	1001	3.6
<b>Total</b>	<b>27,919</b>	<b>100.0%</b>

Source: 2009 American Community Survey

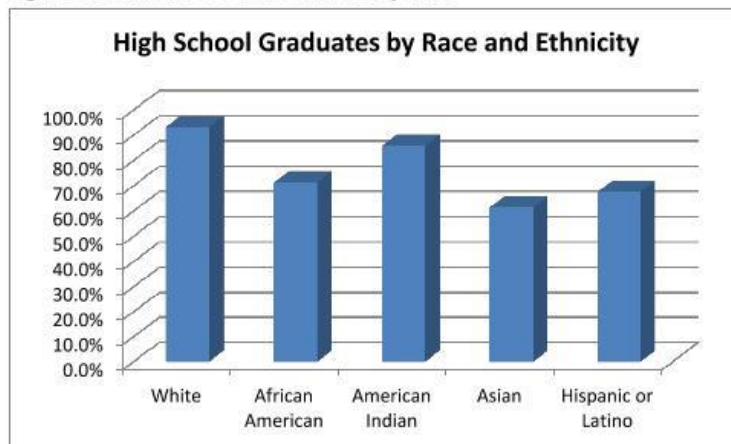
Eau Claire's housing is primarily composed of two- and three-bedroom dwellings, which together make up 68% of the total housing units. The prevalence of two- and three-bedroom units is relevant given the need for larger housing, particularly as experienced by many larger minority families. The need for units with three and four bedrooms is a pressing one in the city.

## Education

According to the 2009 ACS, 92% of city residents 25 years and older graduated from high school. Vast disparities in educational attainment are revealed when analyzed by race and ethnicity. For instance, Asians (61.5%), Latinos (67.7%), and African Americans (71.3%) are significantly less likely to have a high school diploma than whites (93.3%). See Figure 1.

Disparities in education are important to fair housing for several reasons. First, persons with less education tend to have lower incomes than those with more education. This reduces the range of housing available to such households. Also, persons with less education are more likely to have very limited access to educational or financial resources that assist in purchasing a home or obtaining a loan.

**Figure 1: Educational Attainment by Race**



Source: 2009 American Community Survey

### Linguistic Isolation

A household in which no one speaks English well is linguistically isolated. Linguistic isolation hinders a person's ability to integrate economically, academically and socially into our society and has stranded many non-English speakers in low-wage menial jobs.

Almost 6% of Eau Claire's population speaks a language other than English at home. About 2.4% of the population does not speak English very well. Of Eau Claire's linguistically isolated households, 41% speak an Asian language, 35% are Spanish-speaking, 21% are Indo European,<sup>17</sup> and 3% are "other."<sup>18</sup> A population that is both minority and does not speak English well may face discrimination based on national origin as well as challenges related to obtaining housing, like communicating effectively with a rental agent, real estate agent, mortgage lender or insurance agent.

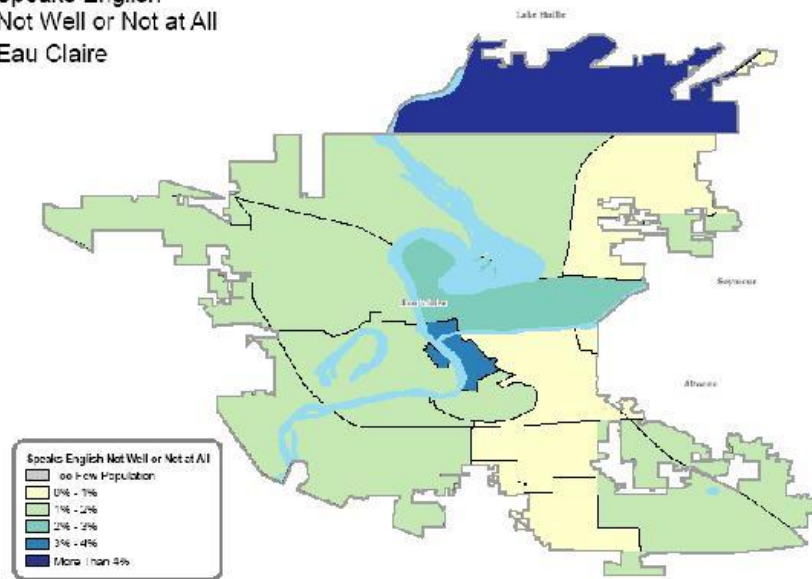
<sup>17</sup> Indo-European languages in Eau Claire consist of French, Italian, German, Slavic, and Persian.

<sup>18</sup> According to the 2009 American Community Survey



**Map 7: Eau Claire, Linguistic Isolation, 2010**

Speaks English  
Not Well or Not at All  
Eau Claire



Source: American Community Survey, 2005 - 2009 Pooled - Table B17005

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### Comparable Entitlement Jurisdictions

It is helpful to compare Eau Claire to similar entitlement jurisdictions in Wisconsin.<sup>19</sup> Using 2005-2009 American Community Survey data and 2010 U.S. Census data, the cities of La Crosse and Wausau were briefly reviewed to contrast Eau Claire's demographics with those of other communities.

<sup>19</sup> Entitlement jurisdictions are those that receive CDBG and/or HOME funds from U.S. Department of Housing and Urban Development.



**Table 7: La Crosse, Wausau & Eau Claire Total Population, 2010**

	La Crosse	Wausau	Eau Claire
2010 Population	51,320	39,106	65,883

**Table 8: La Crosse, Wausau & Eau Claire Race and Ethnicity Proportions, 2009**

	La Crosse	Wausau	Eau Claire
Percent White	91.7	85.2	90.3
Percent African American	2.2	0.9	1.1
Percent Asian American	4.1	11.3	4.6
Percent Hispanic	0.9	1.3	1.9

**Table 9: La Crosse, Wausau & Eau Claire Poverty Rate by Race and Ethnicity, 2009**

	La Crosse	Wausau	Eau Claire
White Poverty Rate	23.6	10.0	17.3
African American Poverty Rate	54.5	35.5	44.0
Asian American Poverty Rate	35.1	24.2	35.5
Hispanic Poverty Rate	32.0	26.8	27.5

**Table 10: La Crosse, Wausau & Eau Claire Median Income by Race and Ethnicity, 2009**

	La Crosse	Wausau	Eau Claire
White Median Income	\$36,152	\$41,614	\$40,535
African American Median Income	\$16,851	\$27,019	\$29,306
Asian American Median Income	\$39,103	\$38,641	\$30,000
Hispanic Median Income	\$28,000	\$30,692	\$27,326

**Table 11: La Crosse, Wausau & Eau Claire Homeownership by Race and Ethnicity, 2009**

	La Crosse	Wausau	Eau Claire
White Homeownership Rate	51.1	63.2	56.8
African American Homeownership Rate	2.8	0.0	25.6
Asian American Homeownership Rate	52.3	30.3	42.0
Hispanic Homeownership Rate	32.0	27.9	16.6

While Eau Claire is larger than the cities of La Crosse and Wausau, similar disparities among racial and ethnic lines exist. Similarities, illustrated in Tables 7 through 11 on the following pages, include:

- Asian Americans are the largest minority group in all three communities.
- Nonwhites experience poverty to a greater degree in all the communities.
- Nonwhites have lower median incomes in all three communities, with the exception of Asian Americans in Wausau and La Crosse, whose incomes are statistically identical to those of whites.
- Nonwhites have a significantly lower homeownership rate in all three communities.

By and large, Eau Claire's race and ethnic disparities and related impediments are not unique to Eau Claire and must be addressed by all communities.

## Fair Housing Impediments

As mentioned in this report's introduction, an impediment to fair housing is anything that may hinder or prevent a person from having equal access to housing because of membership in a federal or Tennessee protected class. Impediments may take the form of a city or other governmental entity's policy, practice or procedure, housing industry practices, or other societal factors.

This section describes fair housing impediments identified through MMFHC's research and interviews with community representatives. Impediments are organized into three broad categories:

- City of Eau Claire impediments,
- Federal and State of Wisconsin impediments, and
- Private market impediments.

Some impediments fall under more than one of the above categories.

#### Impediment #1: Flawed City Fair Housing Ordinance

In order to complete a thorough analysis of impediments to fair housing choice in Eau Claire, it is necessary to review the City ordinance that seeks to protect individuals' rights to housing: "Chapter 9.16 – Fair Housing." The mere existence of a local fair housing ordinance is not sufficient to ensure that equal housing opportunities are realized within a community. The law must have broad protections, remedies and enforcement mechanisms available to victims of illegal housing discrimination.

This section will detail some of the more problematic aspects of the ordinance; because of space constraints it is not possible to provide an exhaustive analysis of each. Listed below are some of the features of the ordinance that create impediments to fair housing in Eau Claire.

#### The Ordinance Does Not Provide Comprehensive Protections

Eau Claire's fair housing ordinance provides no protections on the basis of familial status (also called "family status") or sexual orientation, and is therefore inconsistent with the state fair housing statute, the Wisconsin Open Housing Law (WOHL). WOHL has included protections on the basis of sexual orientation since 1982 and family status since 1989; the federal Fair Housing Act has included protections based on familial status since 1988. As a result, the Eau Claire fair housing ordinance fails to protect families with children, multi-generational families and other family configurations (such as adult siblings living together) from discrimination. Persons experiencing discrimination in Eau Claire on the basis of sexual orientation or family status have no local source of remedy.

Inconsistencies between WOHL and local municipalities' fair housing ordinances are confusing to housing consumers and providers and can lead to uneven enforcement of the law, lack of compliance with the law and underreporting of complaints by housing consumers.

#### The Ordinance is Unclear Regarding Persons Protected Under the Ordinance

There are many instances in which the Eau Claire fair housing ordinance is unclear about what the protected classes actually are, and how those protected classes are defined:

- a) In 9.16.010, the "Definitions" section, there are only 6 protected classes listed (race, color, religion, ancestry, national origin, sex), whereas in 9.16.020, the "Purpose" section, there are 10 protected categories listed (sex, race, color, handicap, religion, national origin, sex or marital status of the person maintaining a household, lawful source of income, age, ancestry). This may lead to confusion on the part of both housing providers and consumers.
- b) Only one protected class ("handicap") is defined in the ordinance. The lack of detailed definitions for other protected classes can lead to confusion for both housing providers and consumers as to who is protected under this law. Including definitions of each protected classes could alleviate such confusion and would be consistent with WOHL. In particular, the categories of age, marital status and lawful source of income are poorly understood by housing providers and housing consumers. For example, it's not commonplace for a housing

consumer to know whether “lawful source of income” includes protections for Social Security Disability income, food stamps, or participation in the Section 8 Rent Assistance Program. Similarly, housing consumers and providers often seek technical assistance from MMFHC on who, specifically, is covered by the protected classes of age and marital status.

Further, the definition of “handicap” in the ordinance is very brief and unclear as to precisely what types of disabilities are protected, and whether Eau Claire’s definition is consistent with WOHL or the federal Fair Housing Act.

- c) In the section “Definitions,” the list of protected classes concludes with “. . . of another person.” This language is ambiguous and may confuse readers as to whether it refers to a homeseeker or another person in the homeseeker’s household.
- d) In the section “Prohibited acts,” items 2, 3 and 4 refer to the protected class of the “person refused.” This excludes protection for persons who are provided unlawful treatment not because of their membership in a protected class, but rather their association with a member of a protected class. For example, it does not protect persons who have friends or family members of another race from being denied housing. Discrimination based on association with a member of a protected class is not uncommon, and should be specifically protected by the ordinance.
- e) The ordinance states that housing providers may require references (Section 9.16.050) concerning a homeseeker’s “family, marital, financial or business status,” but not relating to “race, color, physical condition, developmental disability . . . or creed.” The omission of the other protected classes of such as national origin, religion and ancestry implies that it is permissible to ask questions or obtain references on those bases when, in fact, that would be violative of state and federal fair housing laws. Moreover, “physical condition” and “creed” appear nowhere else in the ordinance and are not defined.

#### The Ordinance Fails to Provide Comprehensive Listing of Prohibited Acts

The ordinance does not include several protections afforded under state and federal fair housing laws, including prohibited acts such as:

- failure to negotiate
- providing untruthful information
- providing different terms and conditions
- eviction or termination of tenancy based on membership in a protected class

#### The Ordinance Lacks Adequate Protection for Persons with Disabilities

As noted above, the ordinance provides an inadequate definition of “handicap,” but it also falls short of adequate protections for persons with disabilities in other ways, including:

- The ordinance does not contain a provision that would permit persons with disabilities to make reasonable modifications of existing housing to allow full use and enjoyment of the

housing. Such a provision, found in both federal and state laws, ensures that persons with disabilities may make modifications to the premises, such as a ramp to the outside door of a building for persons who use a wheelchair or a strobe light to alert persons with hearing impairments of emergency situations within a building. There is well-established federal case law as to the rights and protections under this provision of the law.

- The ordinance does not allow for the provision of reasonable accommodations in rules, policies, practices or services to permit persons with disabilities full use and enjoyment of housing. Such accommodations might include a designated parking space to allow a tenant with a disability closer and easier access to the building. This opportunity for persons with disabilities to obtain such accommodations is contained in both state and federal fair housing laws and there is well-established case law in this area.
- The ordinance fails to include requirements that housing be designed and constructed to ensure accessibility for persons with disabilities. Therefore, under the current ordinance it is not a violation to build a multifamily development with doors that are too narrow for persons in a wheelchair or with multiple steps at an entrance door. Both the federal and state fair housing laws include such requirements.

The omission of these protections send a chilling message to persons with disabilities in Eau Claire regarding the level of concern the City has for furthering housing opportunities for persons with disabilities. These omissions are particularly egregious, as enhanced protections for persons with disabilities have been contained in the federal law since 1988 and the state law since 1992.

#### The Ordinance Does Not Prohibit Discrimination in All Areas of the Housing Market

Eau Claire's fair housing ordinance does not provide comprehensive protection against discrimination in all areas of the housing market. As discussed below, some housing industries are not included in the Eau Claire law, contrary to protections afforded in both state and/or federal fair housing laws.

Discrimination in the homeowners insurance market has gained much attention over the past several years. Lawsuits and administrative complaints against some of the largest providers of homeowners insurance in Milwaukee, Toledo, Richmond, Philadelphia, and Washington, DC have revealed widespread forms of discrimination against minority homeowners. The ordinance makes no reference to discrimination in the insurance industry, and thus fails to protect its residents from this form of discrimination. Homeowners insurance is a critical necessity to protect the economic wealth of residents and preserve the viability of neighborhoods. The absence of protection against such discrimination leaves residents, and neighborhoods, vulnerable to the loss of homes.

Secondly, although the ordinance explicitly prohibits the refusal to finance housing, it is silent about discrimination in the terms, conditions or services of such financing. This omission is particularly problematic in view of the persistence of predatory lending, whereby people are not refused financing for their homes, but the terms and conditions of the loan may be less favorable



due to the race, age or gender of the homeowner. The ordinance, as currently written, provides no protection for persons victimized by such practices.

#### The Ordinance is Silent on the Enforcement Process, including Statute of Limitations

Eau Claire's fair housing ordinance does not specify any enforcement procedures or timelines for the filing and adjudication of fair housing complaints. In the absence of any explanation of where to file complaints, when they must be filed, or the process by which a complaint will be investigated and adjudicated, victims of housing discrimination are highly unlikely to seek to remedy their rights under the ordinance. This, like other problems in the ordinance, has a chilling effect for persons discriminated against in housing and is a major impediment for furthering fair housing in Eau Claire.

#### The Ordinance Provides Negligible Penalties for Violations of the Law

The City of Eau Claire mandates that the penalty for violating its fair housing ordinance is "not less than twenty-five dollars nor more than two hundred dollars." Civil forfeitures are intended to punish a violator of the law and deter further illegal conduct. The Eau Claire ordinance accomplishes neither purpose. Such minimal fines discourage victims of housing discrimination from pursuing claims under the ordinance, as no significant redress will be achieved. Further, these limited forfeitures send a message to the community that the City does not regard the deleterious effects of illegal housing discrimination on individual victims, as well as the community at large.

These penalties are substantially lower than those under either federal or state fair housing laws.

#### The Ordinance Does Not Allow Victims of Illegal Housing Discrimination to Obtain Compensatory or Injunctive Relief

In addition to inadequate penalties described above, the ordinance does not allow victims to recover either compensatory damages or injunctive relief. Therefore, victims may not be compensated for out-of-pocket expenses incurred or for the emotional duress experienced as a result of a discriminatory act. Additionally, the ordinance contains no provision for victims to obtain the housing illegally denied them. Both federal and state fair housing laws include these forms of relief for victims as a way to help the person recover true and comprehensive relief for the injury of discrimination. They are essential components for a fair housing law to have meaningful and effective impact in the community.

This analysis addresses some of the provisions of this Ordinance that impede citizens' rights to fair housing. A more thorough analysis of the entire Ordinance should be conducted by the City Attorney to ensure all provisions are consistent with state and federal fair housing laws.



#### Impediment #2: Lack of Housing Units Accessible to Persons with Disabilities

While the City of Eau Claire's policies may not be directly responsible for the shortage of accessible housing, local policy can and should be used to address this shortage.

Ensuring an adequate supply of accessible housing to meet the needs of persons with disabilities must be a City goal. While the actual number of accessible private housing units is not available, the strong need for such housing is apparent. As mentioned in the Demographics section, in 2000 nearly 16% of Eau Claire's population has a disability (including physical disabilities, mental disabilities, mobility disabilities and "other").

Eau Claire has a large proportion of older housing stock; 38% of the City's housing was built in 1959 or earlier. Older housing units are less likely to be accessible to persons with physical disabilities and are more likely to have narrow hallways, small bathrooms, and steps; however, they are also more likely to be affordable. Newer dwellings are more likely to be accessible, but are typically less affordable. This is a critical point because persons with disabilities are more likely to have low income. According to the city of Eau Claire 2010-2014 Consolidated Plan, the majority of persons waiting for one-bedroom public housing are young disabled persons with mental disabilities.

When the Federal Fair Housing Act was amended in 1988, "disability" was added as a protected class. Moreover, the 1988 amendment required multifamily residences built for first occupancy after March 13, 1991 to have a variety of basic accessibility features, such as doorways and hallways of a certain width, an accessible entrance, accessible environmental controls. Over 76% of Eau Claire's housing was built in 1990 or earlier and therefore is not required to meet federal accessibility guidelines.

In addition, approximately 15.2% of Eau Claire households are headed by individuals 60 and older. Frequently, homes owned by the elderly need to be made accessible, as many older adults have mobility impairments leading to difficulty entering and leaving their homes as well as moving efficiently inside them. The supply of rental housing, according to a city-funded 2010 senior housing study, is adequate to meet the current demand of elderly rental households in the Eau Claire market area.

#### Impediment #3: Inadequate Affordable Housing Supply Relative to Resident Income

The Fair Market Rent for a two-bedroom apartment in Eau Claire for 2011 was \$635. According to the National Low Income Housing Coalition's Out of Reach report, in order to afford this level of rent and utilities without paying more than 30% of its income on housing, a household

must earn \$2,117 monthly or \$25,400 annually. Assuming a 40-hour work week, 52 weeks per year, and this level of income translates into a Housing Wage of \$12.21. Eau Claire residents who work in retail, child care and other service jobs will likely be unable to afford that housing wage of \$12.21. According to the 2009 American Community Survey, 51% of Eau Claire's renting households spend 30% or more on housing costs. Additionally, 26.9% of all renting households spend 50% or more of their income on housing costs. Spending more than 30% of household income on rent or housing costs is considered to be a rent burden. Rent burdens are problematic because households spending a large percentage of their income on housing have less to spend on other essentials, like food, child care, health care and transportation. Eau Claire's high rent burden may be due in part to high demand for rental units by students, with little or no income, attending the University of Wisconsin – Eau Claire. When demand for rental units exceeds supply, rents tend to increase. Full time students are less likely to have high income; therefore students may disproportionately have a high rent burden.

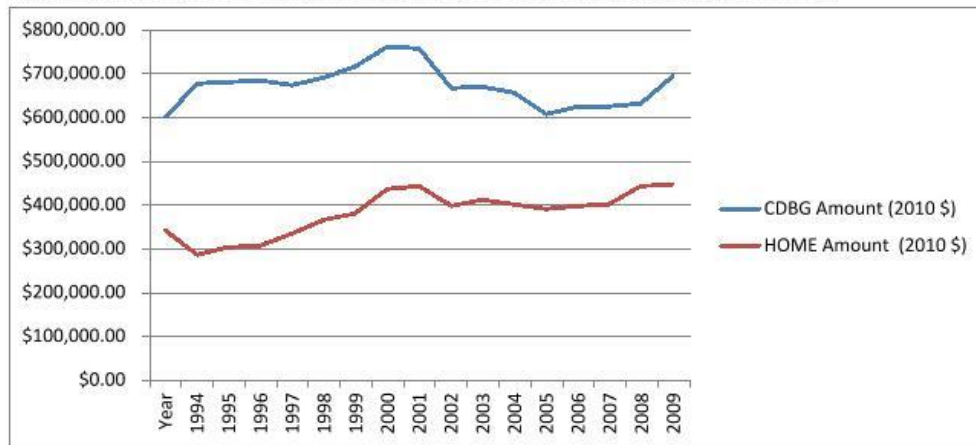
A shortage of affordable housing may not appear to be a fair housing issue on its face. However, the negative impact that lack of affordability has particularly on persons with disabilities, people of color, families with children or the elderly cannot be ignored. An adequate supply of affordable housing, both for ownership and rental, is essential for an open and inclusive housing market in Eau Claire. Evidence of the affordable housing shortage can be found in the Eau Claire Housing Authority's waiting list. The Housing Authority currently assists about 455 households with Section 8 and HOME rent assistance vouchers. As of July 2011, 633 households remain on that waiting list to obtain a voucher. The Eau Claire Housing Authority indicates the longest public housing waiting list is for two-bedroom units and units with four or more bedrooms.

#### The Lack of Financial Resources to Preserve, and/or Rehabilitate Affordable Housing

The shortage of affordable housing is attributable, in part, to a lack of resources to preserve such units in Eau Claire. CDBG and HOME funds are used to build, preserve and rehabilitate housing in the City. However, the demand for these resources exceeds their availability. Constructing any type of affordable housing requires numerous subsidies; layering of subsidies is common in affordable housing projects and is necessary to close financing gaps. Most developers currently obtain financing by combining federal money disbursed through local and state governments, CDBG and HOME grants or loans, the Low Income Housing Tax Credit (LIHTC) program, among other financial resources. In addition to this very complex nature of financing, the development of affordable housing is also highly competitive. When financing and subsidy resources are scarce and a higher return on investment is unlikely, many developers prefer to build simpler and more profitable market rate housing developments.

Complex financing arrangements make the development of affordable housing difficult, and this situation is exacerbated by the fact that already inadequate funding sources are decreasing. The City of Eau Claire's Housing Division received just over \$1,379,000 in CDBG and HOME allocation in 1994, decreasing over time to just \$1,139,000 in 2010. When viewed in present dollar values, the difference over time is even starker.

**Figure 2: Eau Claire CDBG and HOME Funds Over Time (converted to 2010 \$)**



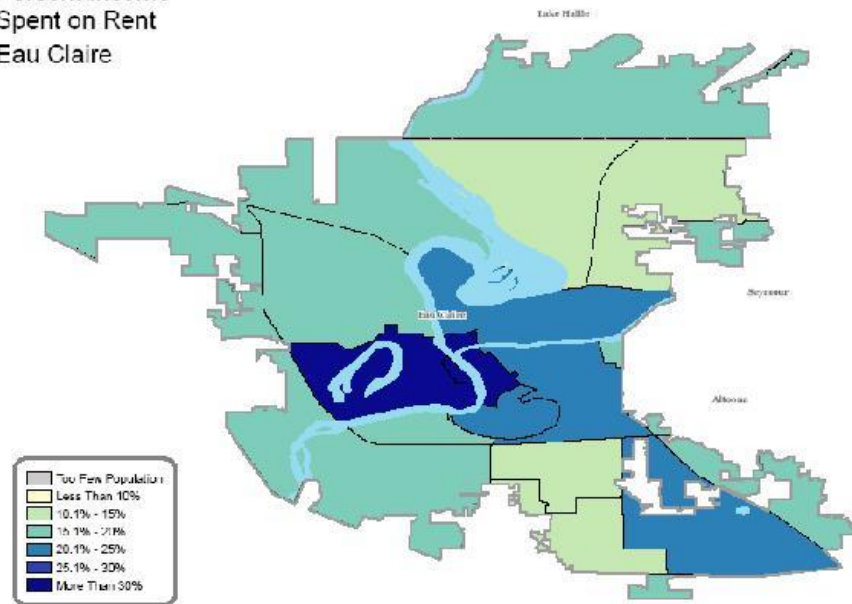
#### Structural Quality of Housing

While Eau Claire has housing that is affordable to those at middle income levels, and even some to those at lower incomes, the condition of that housing is often not taken into account. The age of a housing unit is not an absolute predictor of housing quality. However, it can be assumed that the older the housing structure, the greater the likelihood of code compliance problems.

Housing that is of poor structural quality has negative health and socioeconomic implications for the people who reside in such conditions. Further, some people who are “doubled up” in overcrowded households may not be on the unit’s lease, and thus particularly vulnerable to eviction and homelessness. According to the City of Eau Claire’s Consolidated Plan for 2010-2014, large households are the most likely to have housing problems such as cost burdens and substandard housing. Additionally, the Consolidated Plan indicated that the conversion of large single-family houses into apartments reduces the supply of large units and increases overcrowding.

**Map 8: Percent Spent on Gross Rent, 2010**

Percent Income  
Spent on Rent  
Eau Claire

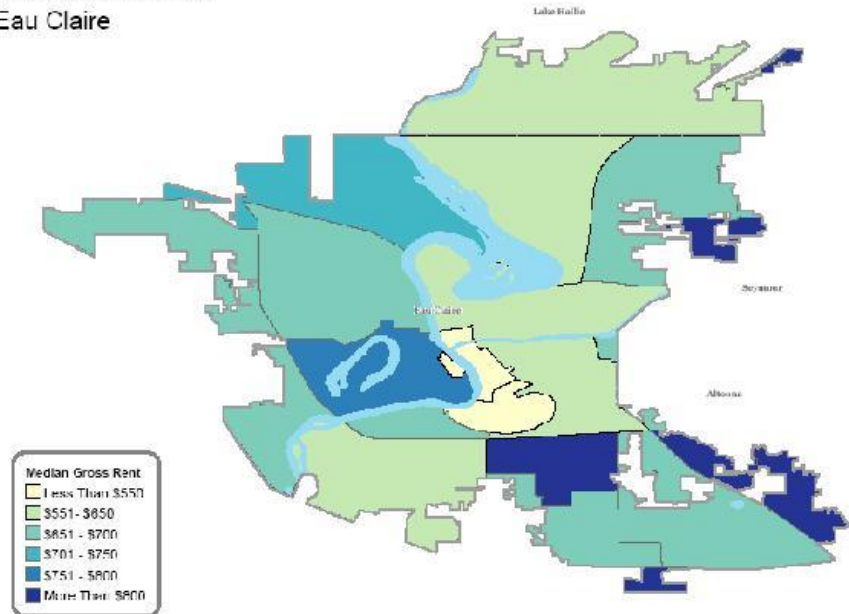


Source: American Community Survey 2005 - 2009 estimates; maps 825054 and 814013

NOAA/CI/USFWS/Minnesota - 2011

**Map 9: Median Gross Rent, 2010**

Median Gross Rent  
Eau Claire



Source: American Community Survey 2005 - 2009 Estimates Table B25064

Northwest Center of Milwaukee - 2011

#### Impediment #4: Poor Credit, Lack of Credit History and Lack of Financial Literacy

Poor credit history, whether incurred by personal choices or circumstances beyond a person's control, can hinder a person's access to housing. Persons new to this country, specifically those who speak Hmong and Spanish, often have not established the credit required to obtain a prime mortgage or rental housing. In addition, both housing industry and advocacy representatives suggest that some African Americans do not have an established relationship with a conventional bank or financial institution and/or have sufficient credit histories. These situations do not make these groups any less likely to be able to responsibly take on a mortgage; however, these situations do make it difficult for lenders to use conventional underwriting guidelines to give them a mortgage and give lenders a seemingly legitimate excuse to deny the loan.



## State and Federal Policies

While the City of Eau Claire is not directly involved in these state and federal impediments, it is essential that this report and the City address them in some way, because they impact the City's ability to "affirmatively further fair housing" as required by HUD. The City must seek to overcome the following impediments in whatever capacity it has, albeit limited.

### Impediment #5: Frequent Attacks on the Community Reinvestment Act (CRA) by Banking Regulators

CRA regulators (the Office of the Comptroller of Currency, the Office of Thrift Supervision, the Federal Reserve Bank and the Federal Deposit Insurance Corporation) submit proposals to weaken the Community Reinvestment Act (CRA). Weakening CRA would be problematic because the provisions of CRA encourage depository institutions to help meet the credit needs of the communities in which they operate, including low- and moderate-income neighborhoods.

CRA requires that each depository institution's record in helping meet the credit needs of its entire community be evaluated periodically. That record is taken into account when federal examiners consider a financial institution's application to add or remove branches, or to merge with or acquire additional institutions. Both urban areas and rural communities depend on the private sector dollars generated by CRA to encourage mortgage lending and small business loans, and to leverage affordable housing and economic development. There is no specific testing evidence to either confirm or deny banks failing to meet credit needs in Eau Claire; however, bank performance should continue to be monitored to ensure credit needs of the community are to be met.

### Impediment #6: Lack of Resources/Incentives for Developers to Build for the Lowest Income Households

As mentioned in the previous section, most resources for the development of affordable housing are provided through federal programs. Resources for the building of new rental housing have lagged far behind the demand, resulting in the shortage of affordable rental housing in many communities. Production of new low-income housing today is primarily achieved through the Low Income Housing Tax Credit (LIHTC) Program. This is the most-utilized program for the production of affordable housing, but it targets households making 50% to 60% of the area median income. Therefore it is insufficient to overcome the affordable housing shortage,

especially for the lowest-income families, those making less than 50% of area median income. While this was not an impediment identified in our analysis of Eau Claire demographics, city officials should continue to evaluate whether there is a need for additional resources to meet the housing needs of the city's lowest income residents.

**Impediment #7: Wisconsin Housing and Economic Development Authority (WHEDA): LIHTC Allocation Scoring Limits Housing Opportunities**

It is in the best interest of communities to increase their supply of high quality affordable housing. The most prevalent tool for building affordable housing is the Low Income Housing Tax Credit (LIHTC). However, WHEDA's tool for scoring LIHTC applicants, the Qualified Allocation Plan (QAP), gives preference to development projects that have local community support. For example, a developer of a LIHTC project must have a letter from the mayor or village president in support of their affordable housing proposal. Under WHEDA's current tax credit scoring policy, it is likely communities that already have affordable housing will continue to allow its development. However, those communities that have a shortage of affordable housing can continue to deny its development, even though there is a need for it. The process of obtaining low-income housing tax credits in Wisconsin is highly competitive and can only be done through WHEDA. Even though the "local support" category accounts for just 6% of the total QAP scoring, this can be enough to eliminate a project, thus preventing its construction in a community in which it may be greatly needed. This policy has the potential to limit housing opportunity, perpetuate segregation and contribute to the concentration of poverty that exists in some communities.



## Private Market Impediments to Fair Housing Choice

Private market impediments exist in housing production, mortgage lending, homeowners insurance, rental and home sales markets. Though the City of Eau Claire is limited in its ability to directly address private market impediments, it can take a leadership role in bringing these issues to the public's attention, educating housing consumers and providers, and enacting additional regulations or legislation to ameliorate problems arising from private market impediments. The following discussion identifies several private market impediments that must be addressed. The impediments listed are all directly or indirectly related to illegal discrimination in the market.

### Impediment #8: Mortgage Lending

#### Discrimination in the Lending Market

Discrimination in mortgage lending prevents or impedes home seekers from obtaining the financing normally required to purchase a home. Discrimination in the home loan industry can take several forms, including: outright denial of a loan; discouraging a loan seeker from applying; offering less favorable rates, terms and service; taking an inordinate amount of time to process applications; and using exclusionary underwriting guidelines. Most evidence of lending discrimination is uncovered from systemic investigations. No such investigations have taken place in Eau Claire.

#### Lack of Spanish and Hmong-speaking Lenders

For persons new to this country who do not speak English, or are more comfortable speaking another language, obtaining a home mortgage can be even more stressful than for other borrowers. Because non-English speaking persons seeking a mortgage often have to rely on their children or other family members to translate, errors and misunderstandings are more likely to occur, and discrimination or fraudulent practices are less likely to be uncovered. The dearth of bilingual lenders in any community creates a greater risk for the likelihood of differential treatment to occur to non-English speaking persons. No analyses were conducted to confirm that lack of Spanish- and Hmong- speaking lenders is an impediment in Eau Claire; however because this impediment occurs throughout the nation, City and housing advocates should continue to monitor needs of these populations to ensure they are met. The Eau Claire Area Hmong Mutual Assistance Association currently provides translation services to the Hmong community in Eau Claire for housing and other services.

### Foreclosures

Foreclosures of single-family homes are a serious threat to neighborhood stability and community wellbeing, particularly low income neighborhoods. Research has shown that the explosion in foreclosures that started in the 1990s was primarily driven by the growth of high risk, subprime lending. Foreclosures, particularly in lower-income neighborhoods, can lead to vacant, boarded-up, or abandoned properties. These properties, in turn, contribute to the stock of “physical disorder” in a community that can create a haven for criminal activity, discourage social capital formation and lead to further disinvestment.<sup>20</sup>

In June 2011, RealtyTrac reported that 1 in every 1,189 Eau Claire County housing units received a foreclosure filing. Eau Claire is faring better than other communities in the state of Wisconsin, but the foreclosure rate still bears scrutiny. Comparatively, Wisconsin’s foreclosure rate is 1 in every 818 homes.<sup>21</sup> Data from case filings reported to the Wisconsin Circuit Court Consolidated Court indicate that in the first quarter of 2011, Eau Claire County had between 0.1 and 1.6 foreclosure filings per 1000 households. Chippewa County had a higher percentage – 2.4 to 2.7 filings per 1000 households. Foreclosure filings in both counties decreased between the first quarter of 2010 and 2011: Chippewa County’s foreclosures decreased between 0.1 and 9.9%; Eau Claire County’s foreclosure filings decreased more than 30%.

### Impediment #9: Homeowners Insurance

#### Discrimination in the Homeowners Insurance Market

Homeowners insurance is a requirement for a home mortgage; therefore, the impact of discrimination in the insurance industry is reflected in racial and ethnic homeownership rate disparities. Racial discrimination in the provision of insurance not only denies fair housing choice, but also fosters disinvestment and the deterioration of neighborhoods. Discrimination in the provision of homeowners insurance can take many forms. Insurance redlining is the systematic refusal of insurers to issue policies and/or providing inferior terms and conditions on property in certain neighborhoods, based on racial stereotypes or other non-market criteria. Minimum policy requirements and restrictions or penalties on older homes also have a discriminatory impact on older inner city neighborhoods.

Despite the plethora of academic studies and legal action taken by organizations, individual complaints concerning discrimination in the insurance market are relatively rare. Insurance discrimination can be subtle, and without knowledge of underwriting policies and rate standards,

<sup>20</sup> Immergluck, Dan and Smith, Geoff, “There Goes the Neighborhood: The Effect of Single-Family Mortgage Foreclosures on Property Values”; Georgia Institute of Technology and the Woodstock Institute, June 2005

<sup>21</sup> RealtyTrac

it is difficult or impossible for homeowners seeking insurance to know that they have received unfavorable treatment. Most evidence of homeowners insurance discrimination is uncovered from systemic investigations. No such investigations have taken place in Eau Claire.

#### Language Barriers in Obtaining Homeowners Insurance

In order to obtain comprehensive homeowners insurance, consumers must have a clear understanding of insurance products and property needs. The area of homeowners insurance can be very complex and technical; many homeowners, especially those purchasing their first home, may be confused or lack knowledge about the proper coverage necessary for their property. This confusion can be exacerbated when homeowners speak languages other than English, or for whom English is a second language. In Eau Claire, the shortage of Hmong and Spanish-speaking insurance agents can be an impediment not only to minority homeownership, but also for obtaining proper insurance coverage for this group of consumers. The dearth of bilingual insurance agents in any community creates a greater risk for the likelihood of differential treatment to occur to non-English speaking persons. No analyses were conducted to confirm that lack of Spanish- and Hmong- speaking insurance agents is an impediment in Eau Claire; however, because this impediment occurs throughout the nation, City and housing advocates should continue to monitor needs of these populations to ensure they are met. As mentioned, the Eau Claire Area Hmong Mutual Assistance Association does provide translation services to the Hmong community in Eau Claire.

#### Impediment #10: Housing Sales and Rental Markets

##### Discrimination in the Sales and Rental Markets

A major impediment to housing choice is discrimination in the sale and rental of housing. In Eau Claire discrimination based on a disability remains the major form of discrimination in the housing market, as evidenced by complaint data which indicates allegations of discrimination based on a disability are the most frequently filed HUD complaints.<sup>22</sup> The protected classes of race and family status are also among the complaints most frequently taken by HUD. In recent years, some statewide and national complaint data indicate that discrimination based on a person's disability has surpassed race. According to HUD's 2007 Annual Report, this is due, at least in part, to the additional protections afforded persons with disabilities under the Fair

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<sup>22</sup> The Wisconsin Equal Rights Division received 12 complaints from Eau Claire County from January 1, 2005 to May 23, 2011. Of those 12 complaints, 6 were rejected and 6 were investigated. Of the 6 investigated 4 were deemed "no probable cause", 1 was deemed "probable cause" and the final was deemed "untimely filed". The "probable cause" complaint's basis was source of income. The bases for the "no probable cause" complaints were a combination of : 2 disability, 2 race, 1 creed, 1 color, 1 ancestry and 1 sex.

Housing Act, e.g., the rights to reasonable accommodations and modifications, as well as the Act's requirements for accessible design and construction in multifamily housing.<sup>23</sup>

It is difficult to assess the severity of the problem of discrimination in the sale of homes in Eau Claire on the basis of the number of complaints that have been reported to the City or fair housing enforcement agencies. Typically, most people who are denied housing or offered unfavorable terms because of discrimination do not realize that discrimination has occurred. In other cases, people may be aware or suspect discrimination, but they may not know where to file a complaint, do not feel that it will be remedied, or do not want to be confrontational. In other cases, people may feel vulnerable and fear retaliation by a housing provider. A local real estate professional indicated that there are instances in which the seller has a racial bias, and in those cases "you have to turn down a listing." However, that doesn't guarantee that the next real estate professional is as ethical.

#### Lack of Spanish and Hmong-speaking Real Estate Brokers

As discussed in the section on homeowners insurance, it is essential for non-English speaking, or limited English speaking persons to have access to housing professionals who are bi- or multilingual. This assures that all homeseekers are afforded the same information and service when purchasing housing. With the burgeoning Hmong and Spanish-speaking populations in Eau Claire, it is important to ensure an equal level of service be available to alleviate this impediment to fair housing choice. The dearth of bilingual real estate professionals in any community creates a greater risk for the likelihood of differential treatment to occur to non-English speaking persons. No analyses were conducted to confirm that lack of Spanish- and Hmong- speaking real estate professional is an impediment in Eau Claire; however because this impediment occurs throughout the nation, City and housing advocates should continue to monitor needs of these populations to ensure they are met. The Eau Claire Area Hmong Mutual Assistance Association does assist in bridging language gaps between the Hmong community and the real estate industry through translation services.

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<sup>23</sup> US Department of Housing and Urban Development, "State of Fair Housing, Annual Report on Fair Housing," 2007

## Recommendations

Recommendations to remedy the identified barriers to fair housing are the most critical element of this document. This section, therefore, should be used as a starting point for the City of Eau Claire to develop and implement a comprehensive fair housing action plan. The recommendations are categorized into:

- 1) City of Eau Claire Policy recommendations – The City has some direct control over implementation of these recommendations.
- 2) Eau Claire County, State and Federal Policy-related recommendations – The City of Eau Claire may have limited control over implementation of these recommendations, but to omit them from this report would leave readers with an incomplete understanding of the fair housing issues facing its residents. Eau Claire should exercise whatever power it has – albeit limited - to enact these recommendations, such as through lobbying, advocacy or educational efforts.
- 3) Private Market-related recommendations – As in the category above, the City of Eau Claire's ability to implement these recommendations may be limited, but those limitations do not completely absolve the City from attempting to execute these recommendations through whatever means at its disposal. Creative, proactive City initiatives could have a large impact on the elimination of fair housing impediments in the private market.

The following recommendations are not in any order of priority.



## City of Eau Claire Recommendations

Create and Implement a Comprehensive Strategy for Production of Affordable and Accessible Housing

Fund an Affordable/Accessible Housing Production Task Force

The City of Eau Claire should establish an Affordable/Accessible Housing Production Task Force. This task force, comprised of private sector and not-for-profit housing experts, would be charged with identifying and securing federal and private funds to help subsidize the development of low-income, affordable and accessible housing. Emphasis should be placed on locating this housing near job growth, on transit lines, and without contributing to existing concentrations of low-income populations. Further, this Task Force should identify the challenges in producing such housing, as well as develop recommendations for policy changes on federal, state, and local levels.

Incorporate Visitability and Home Modification Requirements into City Subsidies/Funding: City CDBG and HOME funds should prioritize funding to projects that will ensure visitability for new construction. In addition the City should continue to fund agencies that provide home modification grants to persons with disabilities. The grants should also be expanded to include landlords with disabled tenants who require a modification. Visitability is an international movement to change home construction practices so that virtually all new homes, whether or not designated for residents who currently have mobility impairments, offer three specific accessibility features. Newly constructed homes often contain the same major barriers as older, existing homes: steps at every entrance, and narrow interior doors, with the bathroom door usually the narrowest door in the house. In the visitability movement, three key features are promoted: At least one zero-step entrance on an accessible route leading from a driveway or public sidewalk, all interior doors providing at least 31.75 inches (81 cm) of unobstructed passage space and at least a half bathroom on the main floor.

Fund Visitability and Accessibility Outreach and Education: Many in the housing industry, including builders, architects, developers and policymakers, don't fully understand the benefits of building visitable housing. The City should partner with organizations that advocate for affordable and accessible housing for persons with disabilities to conduct community outreach and education on these issues.

Identify and Overcome Housing Production Impediments

The City should convene discussions with for-profit and not-for-profit housing producers and lenders regarding how to overcome impediments to the production of accessible, affordable, and

large (4 or more bedrooms) housing units. A secondary goal of these discussions would be to educate for-profit developers about current tools available for the production of affordable housing. Lastly, these discussions may be used to encourage for-profit and not-for-profit housing developers to consider partnering on affordable, accessible and large-unit housing projects.

#### Create a Citywide Housing Trust Fund

The City of Eau Claire should create a local Housing Trust Fund (HTF) – a new, ongoing, dedicated source of revenue to support affordable and accessible housing. The HTF could be administered by the City and support a wide range of housing, including permanent housing services for the homeless as well as the development and preservation of affordable and accessible rental units. The HTF could also support first-time homebuyers and provide preservation assistance for the homes of existing homeowners.

Utilize Tax Incremental Financing (TIF) to Produce Accessible and Affordable Housing: The City of Eau Claire should utilize TIFs<sup>24</sup> to increase the production of housing units accessible for persons with disabilities and affordable to residents with lower incomes. For instance, TIF approval evaluation criteria could prioritize residential development projects that include accessible and/or affordable housing. Additionally, the State of Wisconsin passed TIF legislation in 2009 that allows municipalities to extend their TIF districts by one year after loan for improvements is repaid. The cities can then use that additional tax increment to fund affordable housing in that municipality. Eau Claire should partner with disability rights advocacy groups, local community development groups and affordable housing developers to extend their active TIF districts by one year in order to fund the production of affordable, accessible housing.

#### “Affirmatively Further Fair Housing” and “Section 3” Requirement Education

Local nonprofits and developers who are subrecipients of federal CDBG and HOME funds are not adequately aware of their responsibilities and obligations regarding “affirmatively furthering fair housing”<sup>25</sup> and Section 3,<sup>26</sup> a hiring policy. The City should incorporate education on Section

<sup>24</sup> When a Tax Incremental Finance (TIF) District is created 1) a base value is of the district is assessed; 2) City financed loans allow improvements to the district to be made, 3) all increases in value thereafter are “incremental value” and its tax revenue is used to pay off debt, 4) TIF districts are closed when their debts are paid off.

<sup>25</sup> FHA requires HUD to “administer [housing] programs...in a manner affirmatively to further the policies of [the Fair Housing Act],” including the general policy to “provide, within constitutional limits, for fair housing throughout the United States.” 42 USC §3608(c)(5). A grantee is “required to submit a certification that it will affirmatively further fair housing, which means that it will (1) conduct an analysis to identify impediments to fair housing choice within the jurisdiction; (2) take appropriate actions to overcome the effects of any impediments identified through that analysis; and (3) maintain records reflecting the analysis and actions in this regard.” 24 C.F.R. § 570.601(a)(2) , 24 CFR § 91.225(a).



3 and “affirmatively furthering fair housing” requirements into funding meetings with its CDBG and HOME subrecipients.

#### Support Comprehensive Fair Housing Services

The City should research service provider options to provide fair housing services (conducting housing discrimination complaint intake, case management, investigation and legal referral services to victims of discrimination; investigations of systemic forms of illegal discrimination; and outreach and education throughout the community). Existing local organizations could incorporate a fair housing program into their services, or existing fair housing organizations (such as the Metropolitan Milwaukee Fair Housing Council or Legal Aid Society of Minneapolis) could contract fair housing services to Eau Claire.

Other than complaints to U.S. Department of Housing and Urban Development and the State of Wisconsin Equal Rights Division, there is no testing evidence to confirm or deny discrimination in Eau Claire exists.

Complaints of illegal housing discrimination to the U.S. Department of Housing and Urban Development and the State of Wisconsin Equal Rights Division provide some indication of discrimination in Eau Claire, but only in a limited way. Illegal housing discrimination is vastly underreported, because housing consumers are unaware of their rights, lack knowledge about how to seek a legal remedy, or lack confidence that a legal remedy is obtainable from government agencies that process fair housing complaints. Because of the underreporting of illegal housing discrimination, quantifying it is challenging. Systemic investigations and other fair housing services (such as education to victims, which can empower victims to seek legal remedy) can aid in attempts to understand the prevalence of fair housing law violations. A comprehensive fair housing program includes systemic investigations in the markets of mortgage lending, sales, rental and homeowners insurance to determine whether discrimination based on any protected classes is occurring.

Moreover, provision of fair housing services is an important component of entitlement jurisdictions’ obligation to affirmatively further fair housing.

<sup>26</sup> Section 3 is a means by which the Department of Housing and Urban Development (HUD) fosters local, economic improvement, and individual self-sufficiency. Section 3 is the legal basis for providing jobs for residents and awarding contracts to businesses in areas receiving certain HUD financial assistance.

#### Training for City Staff and Elected Officials

The staff of the City Council and appropriate City departments should be trained and familiarized with 1) the recommendations of this document; 2) the City's Fair Housing Ordinance; 3) the City's obligation to "affirmatively further fair housing" and 4) how to facilitate referrals of fair housing and fair lending inquiries.

#### Outreach to Linguistically Isolated and Bilingual Communities

The City should continue to partner with the Eau Claire Area Hmong Mutual Assistance Association for outreach to the Hmong community. The City should also facilitate the formation of a partnership with organizations that serve Spanish-speaking persons and persons with limited English proficiency to develop a proactive approach to reach these linguistically isolated populations on fair housing and fair lending issues.

#### Fund Consumer Education

The City of Eau Claire should continue to work with Western Dairyland, Catholic Charities and UW-Extension to provide financial literacy services to the community. Improved credit of home seekers will improve chances of securing safe and affordable housing. Additionally, renter education such as the University of Wisconsin - Extension's "Rent Smart" program should be provided to assist potential renters in finding and keeping decent housing.<sup>27</sup>

#### Produce an Annual Report of Lending Practices

The City Comptroller's Office should produce and distribute an annual report of lending activity in the city. A similar report is produced by the City of Milwaukee, City of Milwaukee Annual Review of Lending Practices of Financial Institutions. A report containing similar analyses would be a valuable resource in the City's ability to analyze lending patterns and respond to lending patterns that may harm City residents.

#### Review and Amend Local Fair Housing Ordinance

The Eau Claire fair housing ordinance should be amended to include a definition of "disability" to ensure clarity and protection of persons with disabilities in the City of Eau Claire. Such a definition could be based on state and federal fair housing laws to ensure consistent and comprehensive legal rights for persons with disabilities in the City. The ordinance should also be amended to protect the rights of persons with disabilities to reasonable accommodations and

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<sup>27</sup> Rent Smart curriculum consists of 11 lessons, which may be taught separately or in combination with other units. <http://fyi.uwex.edu/house/rent-smart/>.

modifications, and should be consistent with state and federal fair housing laws in requiring accessibility in new multifamily housing.

The ordinance should also be amended to include definitions for each protected class, and the protected classes should be listed consistently and in full in each instance where a list is part of the ordinance's language.

The ordinance should be amended to unambiguously prohibit discrimination in the provision of homeowners insurance and all facets of the financing of housing.

The ordinance must be amended to ensure that it provides viable enforcement options for victims of housing discrimination. The law should include a process for enforcing the law and a statute of limitations that mirrors state and federal law. It is recommended that Eau Claire review the local ordinances of municipalities within and outside Wisconsin to evaluate other structural mechanisms for local enforcement, such as the use of local administrative law judges in some jurisdictions.

The ordinance should be amended to include specific penalties for violations of the law. Those penalties should be increased to provide a true punitive and deterrent effect, consistent with civil forfeitures delineated in federal and state fair housing laws.

The Ordinance should be amended to include relief for victims of housing discrimination in the form of compensatory and injunctive relief. In order to provide consistent enforcement efforts, the ordinance should be amended to reflect such relief as found in federal and state fair housing laws.

#### Amend Zoning Ordinance Regarding Community Living Arrangements

The City should partner with disability advocacy groups, such as Center for Independent Living for Western Wisconsin and others, to review and analyze the Community Living Arrangements section of its zoning ordinance. The City of Eau Claire's Ordinance is unclear in its regulations. This presents a potential barrier to persons with disabilities and should be reviewed in terms of current and future legal implications and potential liability. Advocates have successfully challenged overly restrictive regulations on group homes as violations of the Federal Fair Housing Act.

## State and Federal Recommendations

### Advocate for Changes in State and Federal Programs to Expand Affordable Housing Options

#### a. Advocate for Additional Section 8 Housing Choice Vouchers

The City should facilitate a meeting with local HUD officials, as well as Wisconsin's U.S. Senators and Representatives, to discuss the adverse impact of recent HUD budget cuts and administrative changes within the Housing Choice Voucher Program on the County and its residents.

#### b. Advocate for Revisions to WHEDA's Low Income Housing Tax Credit (LIHTC) Program Allocation Scoring

WHEDA's tool for scoring LIHTC applicants, the Qualified Allocation Plan (QAP), gives preference to development projects that have community support. As discussed in a previous section, this allows opposition to needed affordable housing to have a chilling effect on LIHTC applications. In order to increase the supply of affordable housing units in the Chippewa Valley area, the City should advocate that WHEDA develop a scoring mechanism that calculates the need for affordable housing based on the wages and salaries of the employment opportunities in that municipality and eliminates the provisions by which developments receive additional scoring points awarded for community support of projects. For example, if a community has a large supply of expensive, unaffordable housing, yet a workforce with many low-paying retail jobs, points could be awarded based on the need in that community for housing which is affordable to those low wage earners.

## Private Market Recommendations

### Advocate for Open and Inclusive Real Estate and Rental Markets

Eau Claire should advocate for more open and inclusive home rental and sales markets by working with the housing industry as follows:

The City should use its relationships within the housing industry to encourage housing providers to seek fair housing training.

The City should encourage greater efforts on the part of the lending, real estate and rental industries to hire and train minority and bilingual lenders, underwriters, real estate and rental professionals.

The City should promote more active participation by providers of rental housing in local rent assistance programs to expand locational choice for low-income and minority residents.

# 2014 HOME Match

## Annual Performance Report HOME Program

U.S. Department of Housing  
and Urban Development  
Office of Community Planning  
and Development

OMB Approval No. 2506-0171  
(exp. 8/31/2009)

Public reporting burden for this collection of information is estimated to average 2.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

The HOME statute imposes a significant number of data collection and reporting requirements. This includes information on assisted properties, on the owners or tenants of the properties, and on other programmatic areas. The information will be used: 1) to assist HOME participants in managing their programs; 2) to track performance of participants in meeting fund commitment and expenditure deadlines; 3) to permit HUD to determine whether each participant meets the HOME statutory income targeting and affordability requirements; and 4) to permit HUD to determine compliance with other statutory and regulatory program requirements. This data collection is authorized under Title II of the Cranston-Gonzalez National Affordable Housing Act or related authorities. Access to Federal grant funds is contingent on the reporting of certain project-specific data elements. Records of information collected will be maintained by the recipients of the assistance. Information on activities and expenditures of grant funds is public information and is generally available for disclosure. Recipients are responsible for ensuring confidentiality when public disclosure is not required.

This form is intended to collect numeric data to be aggregated nationally as a complement to data collected through the Cash and Management Information (CMI) System. Participants should enter the reporting period in the first block. The reporting period is October 1 to September 30. Instructions are included for each section if further explanation is needed.

Submit this form on or before December 31.	This report is for period (mm/dd/yyyy)		Date Submitted (mm/dd/yyyy)
Send one copy to the appropriate HUD Field Office and one copy to: <b>HOME Program, Rm 7176, 451 7th Street, S.W., Washington D.C. 20410</b>	Starting	Ending	

### Part I Participant Identification

1. Participant Number	2. Participant Name		
3. Name of Person completing this report		4. Phone Number (Include Area Code)	
5. Address	6. City	7. State	8. Zip Code

### Part II Program Income

Enter the following program income amounts for the reporting period: in block 1, enter the balance on hand at the beginning; in block 2, enter the amount generated; in block 3, enter the amount expended; and in block 4, enter the amount for Tenant-Based rental Assistance.

1. Balance on hand at Beginning of Reporting Period	2. Amount received during Reporting Period	3. Total amount expended during Reporting Period	4. Amount expended for Tenant-Based Rental Assistance	5. Balance on hand at end of Reporting Period (1 + 2 - 3) = 5
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### Part III Minority Business Enterprises (MBE) and Women Business Enterprises (WBE)

In the table below, indicate the number and dollar value of contracts for HOME projects completed during the reporting period.

	a. Total	Minority Business Enterprises (MBE)				f. White Non-Hispanic
		b. Alaskan Native or American Indian	c. Asian or Pacific Islander	d. Black Non-Hispanic	e. Hispanic	
A. Contracts						
1. Number						
2. Dollar Amount						
B. Sub-Contracts						
1. Number						
2. Dollar Amount						
	a. Total	b. Women Business Enterprises (WBE)	c. Male			
C. Contracts						
1. Number						
2. Dollar Amount						
D. Sub-Contracts						
1. Number						
2. Dollar Amounts						

**Part IV Minority Owners of Rental Property**

In the table below, indicate the number of HOME assisted rental property owners and the total dollar amount of HOME funds in these rental properties assisted during the reporting period.

	a. Total	Minority Property Owners				f. White Non-Hispanic
		b. Alaskan Native or American Indian	c. Asian or Pacific Islander	d. Black Non-Hispanic	e. Hispanic	
1. Number						
2. Dollar Amount						

**Part V Relocation and Real Property Acquisition**

Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition. The data provided should reflect only displacements and acquisitions occurring during the reporting period.

	a. Number	b. Cost				
1. Parcels Acquired						
2. Businesses Displaced						
3. Nonprofit Organizations Displaced						
4. Households Temporarily Relocated, not Displaced						
Households Displaced	a. Total	Minority Business Enterprises (MBE)				f. White Non-Hispanic
		b. Alaskan Native or American Indian	c. Asian or Pacific Islander	d. Black Non-Hispanic	e. Hispanic	
5. Households Displaced –Number						
6. Households Displaced –Cost						



## 2014 Geographic Distribution

### GEOGRAPHIC DISTRIBUTION

Address	Type of Activity	LMI Census Tract or Block Group?	Area of Minority Concern?
Joan St	Housing Rehab	No, 101	N
Hobart St	Housing Rehab	Yes, 14	N
Park Ridge Dr	Housing Rehab	Yes, 12	N
Plum St	Housing Rehab	Yes, 10	N
Jeffers Rd	Housing Rehab	Yes, 15	N
Vine St	Housing Rehab	Yes, 14	N
Rowe St	Housing Rehab	No	N
Wellington Dr	Housing Rehab	Yes, 5.01	N
Starr Ave	Housing Rehab	Yes, 6	N
Hoover Ave	Housing Rehab	Yes, 4	N
Wellington Dr	Weatherization	Yes, 5.01	N
Driftwood Ln	Weatherization	No, 15	N
Bolles St	Weatherization	Yes, 14	N
W Grant Ave	Purchase Assistance	Yes, 11.02	N
5 <sup>th</sup> St	Purchase Assistance	Yes, 14	N